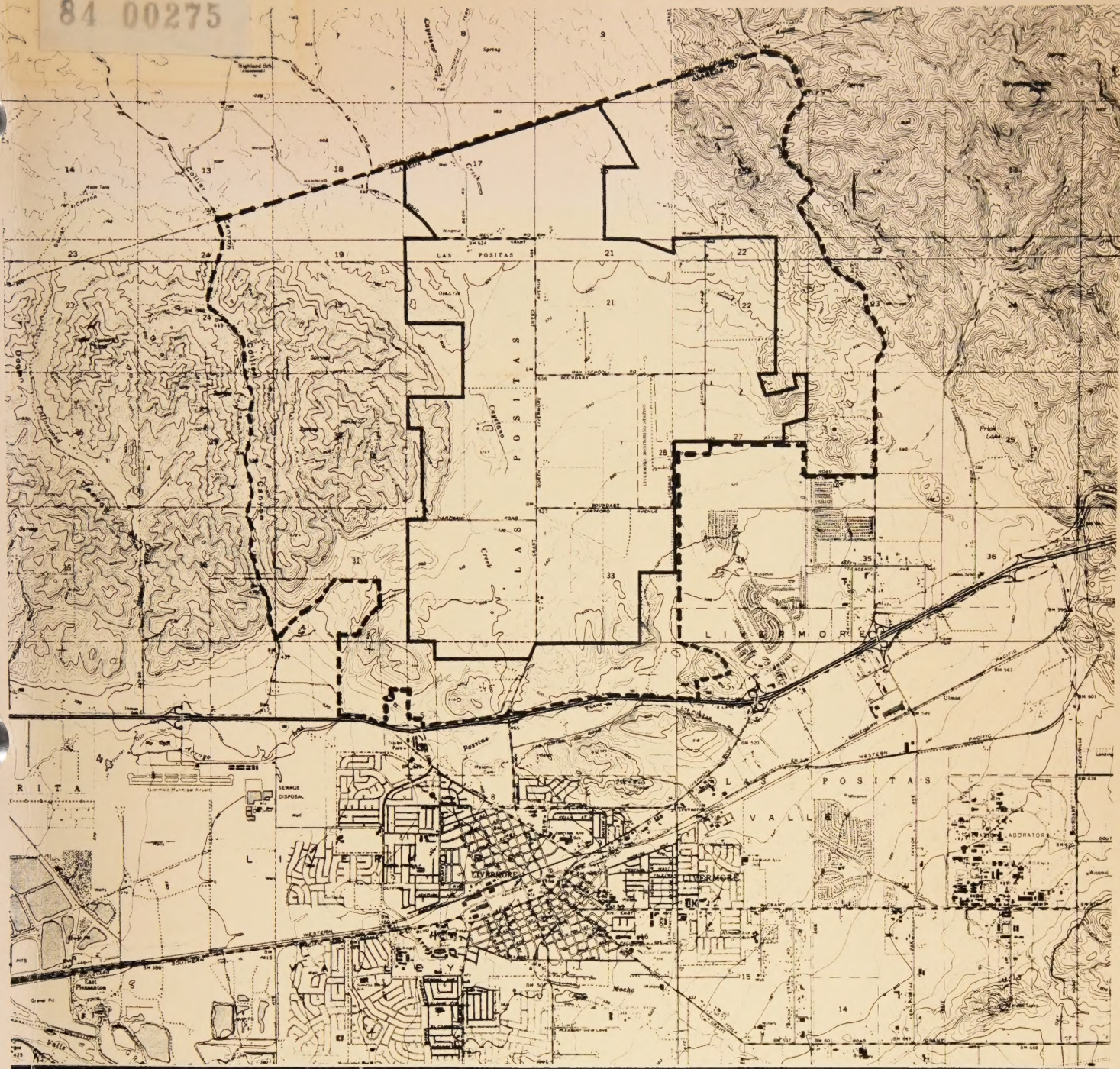


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# **LAS POSITAS**

## **GENERAL PLAN AMENDMENT and REZONING CONSIDERATIONS Environmental Impact Report**

**Alameda County Planning Department • December 1983**

This document, together with the Draft Environmental Impact Report, dated June, 1982, and the Revised Draft Environmental Impact Report, dated March, 1983, constitute the Final Environmental Impact Report for this project.





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LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS  
ENVIRONMENTAL IMPACT REPORT

Alameda County Planning Department  
December 19, 1983

This document, together with the Draft Environmental Impact Report, dated June, 1982, and the Revised Draft Environmental Impact Report, dated March, 1983, constitute the Final Environmental Impact Report for this project.





## TABLE OF CONTENTS

### INTRODUCTION

### SUMMARY

- I. AGENCIES, ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED IN WRITING ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
- II. PLANNING DEPARTMENT STAFF RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
- III. WRITTEN COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
- IV. MINUTES OF THE PLANNING COMMISSION HEARING ON THE LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS AND ENVIRONMENTAL IMPACT REPORT

### APPENDICES

- A. Revised Transportation Analysis, A Supplement to the March 1983 Revised Draft EIR, Wilsey & Ham, November 1983
- B. Biologists Report re. San Joaquin kit fox and Alameda striped racer, Environmental Science Associates, Inc., July 8, 1983
- C. Revisions to Tables 5.39, 5.47, and 5.44 of the Revised Draft EIR, Angus McDonald & Associates, November 1983





Las Positas Environmental Impact Report  
December 19, 1983

## INTRODUCTION

### Background

In December, 1981, the County of Alameda Planning Commission agreed to consider the application of the Las Positas Land Company proposing amendment to the County General Plan to permit urban residential, commercial, and industrial development on approximately 4,417 acres located north of the City of Livermore in an unincorporated area bounded on the south by I-580, on the west by Collier Canyon Road, on the north by Contra Costa County, and on the east by North Vasco Road. Under the proposal of the Las Positas Land Company, the "project sponsors," the area would be developed through a 20<sup>+</sup> year period to include 18,000 housing units on 2,226 acres, plus commercial uses (103 acres), industrial and commercial office employment areas (543 acres), public and institutional uses (420 acres) and recreational and open space areas (815 acres). Public services would be provided by a combination of existing and new service entities to be funded, in part, through a proposed County Service Area. A discrete sewerage system is proposed, with on-site treatment for irrigation of landscaping and open space areas.

The Notice of Preparation of a Draft EIR for the proposed amendment was referred on February 9, 1982; the first Draft EIR for the application was issued on June 18, 1982. Subsequent to this, the County received an application from the Las Positas Land Company requesting concurrent consideration of rezoning of lands within the Plan amendment area which they own or control through purchase options. Because these lands comprise only approximately half of the entire area proposed for urban uses in the original Plan amendment request, the Planning Commission, on June 21, 1982, agreed to establish an expanded area of rezoning consideration in the 1521st Zoning Unit to coincide with the area of proposed for Plan amendment. All affected property owners were subsequently notified of this action.

The Planning Commission public hearing on the matter began in June, 1982, and has been continued to allow public review and discussion of the project and project DEIR, in compliance with state Planning Law and with CEQA and state and County EIR guidelines. At the hearing of December 20, 1982, the Planning Department staff advised that a revised Draft EIR was needed and would be prepared for the Plan amendment and rezoning considerations to incorporate significant new information on the project and project impacts, which information had been developed subsequent to issuance and public review of the June 1982 DEIR, and which, therefore, had not been available for adequate public review and comment.

The Revised Draft EIR was issued in March, 1983. It incorporated a number of revisions prepared in response to comments on the first DEIR document.



Las Positas Environmental Impact Report  
December 19, 1983

It also included, as an Appendix, minutes of the public hearing on the matter, copies of all written comments on the June 1982 DEIR, and proposed staff responses to these comments. Oral testimony and written comments on the Revised Draft EIR were received through May, 1983. The public hearing has since been continued to allow completion of this Final Environmental Impact Report.

Documents Comprising The Final Environmental Impact Report

The Final Environmental Impact Report for the Las Positas General Plan Amendment and Rezoning Considerations consists of the following basic documents which have been referred to concerned agencies, organizations, and individuals for their review and comment:

- . The Las Positas General Plan Amendment Consideration Draft Environmental Impact Report, prepared by the Alameda County Planning Department, dated June, 1982;
- . The Las Positas General Plan Amendment and Rezoning Considerations Draft Environmental Impact Report (a revision of the June, 1982 DEIR), prepared by the Alameda County Planning Department, dated March, 1983;
- . Comments Received on the June, 1982 DEIR, included under separate cover as Appendix B to the June, 1982 DEIR;
- . Planning Department Staff Responses to Written Comments Received on the June, 1982 DEIR, included under separate cover as Appendix A to the June, 1982 DEIR; and
- . The current document, entitled Las Positas General Plan Amendment and Rezoning Considerations, Environmental Impact Report, dated December, 1983.

These documents, as well as all materials included therein by reference, comprise the Final Environmental Impact Report on the subject Plan amendment and rezoning considerations, and should be considered in forming a judgment on the environmental significance of the project.



SUMMARY

A summary of findings regarding significant environmental impacts, and proposed mitigation, was included in the Draft EIR documents. The current document also includes a summary of impacts and mitigation, drawn from the March 1983 Revised DEIR, as well as a review of the comments made on the Draft EIR (summarized from Sections II and IV of this EIR document), and staff responses to these (summarized from Section III). The organization of this summary is indicated below.

This summary is not intended as a substitute for reading the full report for those who would comprehend the full environmental implications of this large and complex project.

Contents

- A. Air Quality
- B. Biotic Conditions
- C. Geologic Conditions
- D. Hydrologic Conditions
- E. Housing and Employment
- F. Public Plans and Policies
- G. Police Protection
- H. Fire Protection
- I. Education
- J. Library
- K. Water Supply
- L. Wastewater Treatment and Disposal
- M. Streets and Highways
- N. Air Transportation
- O. Fiscal and Administrative
- P. Land Uses

A. Air Quality

1. Summary of Findings in the DEIR (March 1983 Revised Draft Environmental Impact Report): Construction activity, to continue between 1985 and 2005, would generate emissions from construction equipment and trucks, suspended particulates from activity on disturbed sites and paved and unpaved roads, and wind-blown fugitive dust from disturbed areas. The vehicle emissions from construction activities would be relatively minor when compared to project long-term air quality impacts.

Mitigation of suspended particulate levels could be achieved to some degree by complying with standard dust suppression techniques including watering or oiling unpaved areas during construction, revegetation of graded or vacant land if construction activities are postponed, and suspending grading operations in high winds.

Long-term air quality impacts would begin in 1985 and would increase through and beyond the year 2005 anticipated completion date. Emissions would be generated from both stationary and mobile sources. The principal pollutant emitted from stationary sources would be oxides of nitrogen from fuel combustion. These would reach about 0.5 tons a day (cold day) at project buildout. In the Revised DEIR, local concentrations of carbon monoxide were projected to reach 7.3 ppm (eight hour maximum) along North Livermore Avenue in the project area, with I-580 contributing up to an additional 0.5 ppm in the vicinity of the freeway. Outside the project area, carbon monoxide concentrations along I-580, from Airway Boulevard to El Charro Boulevard were projected to reach 8.7 ppm (eight hour maximum) with the Las Positas project (without mitigation measures); the addition of a background concentration along this sector could result in the standard being exceeded. In other locations analyzed, predicted CO concentrations were expected to remain well below the eight-hour standard. These projections of carbon monoxide concentrations have since been revised (generally downward) based on revisions to the transportation analysis, and is discussed further, under Comments and Staff Responses, below.

Hydrocarbon emissions, from vehicular travel generated by the project, were projected to reach approximately 0.34 metric tons per day at buildout; this would be approximately 5 percent of total emissions in the Livermore-Amador Valley and San Ramon Valley under trend projections of growth for the area. Reflecting changes in the transportation analysis, it is expected that amounts from the project would increase, but still remain at approximately 5 percent of the total: emissions from the project would increase to reflect



a greater proportion of external (longer) trips than was used in the earlier analysis; however, emissions for the entire Valley would also increase, reflecting revised, higher projections of total employment in the Valley (per ABAG's Projections '83).

Local measures for mitigation of these air quality impacts could include: road, interchange and highway improvements to reduce traffic congestion; local and inter-urban transit services; provision of a site and right-of-way for a possible BART or express bus extension; programs to encourage ride-sharing, staggered or flexible working hours. Implementation of more stringent emission controls would require changes in state and federal legislation.

2. Summary of Comments and Staff Responses:

A number of comments were critical of the air quality analysis and of the traffic analysis on which the former was based:

- a. The Air Quality Management District comments that organic emissions from industrial sources may be understated in the RDEIR (BAAQMD, letter of May 16, 1983). Staff agrees with the District position that NO<sub>x</sub> levels could be higher than indicated in the RDEIR, dependent upon the types of industries that actually locate in the proposed development. Any stationary source of potential significant emissions would be regulated by the Air Quality Management District to minimize and/or offset these.
- b. The District also recommends that future background levels of carbon monoxide along certain major arterials and I-580 freeway should be integrated into the tables, and not merely mentioned in the text and footnotes. The District feels that a preferred method for estimating these would be CO monitoring in various locations under worst-case conditions (BAAQMD, May 16, 1983).

The cited tables have been revised to integrate projected background levels and are included on pages 16 and 17 of this document. The revised tables also reflect revisions to the transportation analysis.

The monitoring program recommended by the District would require the collection of extensive meteorological data over an extended period of time; the time, effort and cost to develop this data is beyond the scope of the current analysis.

- c. The City of Livermore recommends that air quality impacts of the Las Positas project should be added to the list of unavoidable adverse impacts (City of Livermore, May 16, 1983)

Staff agrees that emissions from the Las Positas project, due primarily to increases in amounts of auto travel, would constitute a significant addition to that otherwise projected for the basin, and would constitute an adverse impact which could not be fully mitigated by measures under the control of the County. These impacts would be unavoidable without implementation of more stringent emission controls requiring changes in current state and federal legislation.

- d. Comments on the EIR dispute the following assumptions, which were used in the Revised DEIR to estimate impacts on air quality and transportation systems:

- 1) the assumption that 60 percent of peak hour and 65 percent of average daily traffic will be internal to the project;
- 2) the assumption that 80 percent of Las Positas employees will live within the project; and
- 3) the assumption that Transportation System Management System (TSM) strategies would reduce traffic effects up to 25 percent. (City of Livermore, May 16, 1983; Association of Bay Area Governments, May 16, 1983; BAAQMD, May 16, 1983)

Revisions to the transportation analysis have been made, and are included as an Appendix to this Environmental Impact Report. The revised analysis bases the traffic impacts and resultant mitigation measures on the results of application of a computer model which forecasts and assigns anticipated traffic generated by the project, as well as other approved and anticipated developments in the area. The revised analysis, and its findings, are described more fully in Section X of this Summary, as are the specific responses to the points raised above.

- e. Assumptions regarding project phasing were also disputed. The Air Quality Management District (letter of May 16, 1983) comments that project phasing may be critical, lest new housing be occupied by long-distance commuters before there is



enough employment available for Las Positas residents; this condition could exacerbate the commuting problem, with further air quality degradation.

Staff agrees that the coordinated phasing of residential, commercial and industrial development in the project is important. However, we conclude that the actual achievement of proposed amounts of commercial and industrial development within Las Positas may be of greater concern, in terms of potential traffic and air quality impacts.

## C. Biotic Conditions

### 1. Summary of Findings in the DEIR

The overall character of the biotic community in the Las Positas project area would change significantly with development of the proposed uses. This impact is unmitigable. There is the known presence of *C. palmatus*, and possible presence of other endangered plant species; the habitat areas of these would be eliminated through proposed urban development. Further field investigations would be needed to supplement current information on project area animal and plant life. Many of the native animal species now inhabiting the area would be displaced as urban development progresses. Most existing aquatic habitats (e.g., stream channels) would be maintained, but some physical disturbance to these would be necessary in some locations. Potential impacts on the rare San Joaquin kit fox and on the Alameda striped racer snake were not determined at the time of preparation of the RDEIR. The project area is within the foraging range of the golden eagle and prairie falcon and urbanization within the project area would eliminate a portion of this; it is difficult to assess the adversity of this impact on these species due to limited information on their populations.

As mitigation, the RDEIR noted that further on-site investigations would be required in order to more precisely define and identify significant habitat areas, and to provide a basis for a habitat management plan for the area. Protection of some significant habitat areas may be achieved through specific site development conditions and requirements, through adjustments in the land use plan, through establishing set-back distances and buffer zones, and through development and management provisions to minimize indirect impacts of development on protected habitat areas.

2. Summary of Comments and Staff Responses

- a. The East Bay Regional Park District (letter of May 9, 1983) and the State Department of Fish and Game (letter of May 9, 1983) recommend that a survey should have been conducted of the site to determine the presence or possible presence of rare or endangered wildlife, particularly the San Joaquin kit fox, and the Alameda striped racer, and that findings of the survey should be included in the project EIR.

In response to these comments, a survey of the project area was conducted by biologists of Environmental Science Associates, Inc., to examine the area for animal sign and suitable habitat for the San Joaquin kit fox and the Alameda striped racer. The consultants noted that certain parts of the Las Positas area exhibit potential habitat for the kit fox. These are shown in Figure C.2.1, of this EIR. They conclude that kit fox could be feeding and using dens in portions of the Las Positas site and in other adjacent lands delineated. The Las Positas project would remove any kit fox habitat within the site from use by the species. Further, introduction of human activity and domestic dogs would disturb adjacent lands which the kit fox may presently use. They recommend that the potential kit fox habitat delineated be zoned for open space. Should this prove infeasible, they recommend that the California Department of Fish and Game be consulted to design the final project plan to protect kit fox habitat to the greatest degree possible, and to establish the need for further verification of kit fox on specific areas of the project area.

The consultants found no evidence of the Alameda striped racer snake. They note that this species inhabits chaparral and may venture into rocks and grassland directly adjacent to chaparral vegetation. This type of habitat does not exist in the project area, and this species would not likely be found there.

- b. The Department of Fish and Game (letter of May 9, 1983) notes that a complete biological reconnaissance is essential and should be made a condition for approval of the project and certification of the EIR.

Staff agrees. A detailed biological reconnaissance would need to be undertaken prior to any development. It is recommended as a necessary part of project impact mitigation. The



reconnaissance would serve as the basis for an area biological management plan, to be developed in coordination with concerned agencies and organizations.

D. Geologic Conditions

1. Summary of Findings in the DEIR

Impacts associated with slope stability would not be significant if certain adjustments in the land use diagram were made; currently, some development is indicated in areas where slopes exceed 15 percent. The potential for horizontal or vertical displacements of the ground surface along active faults within the project area is not believed to be significant. It is considered probable that, during the next 20 years, the entire site will be shaken by at least one earthquake of Richter magnitude 6.0 or greater originating on one of the faults in the region, and by numerous earthquakes of lesser magnitude having epicentral locations within 20 miles of the project area. It is estimated that an earthquake with Richter magnitude 7.5 originating on the Calaveras Fault is the maximum probable earthquake that could affect the area. The recurrence interval for such an earthquake would be in the range of 50 to 150 years. The most significant engineering consideration of site soils is their expansive nature, presenting potential problems associated with construction and design of structures and improvements.

As mitigation, further site-specific investigations would be needed to determine the potential for surface movements along any faults previously mapped and/or suspected across the project area. The results of such investigations would provide the basis for determining appropriate setback distances for different types of structures. Use and enforcement of the present UBC provisions should provide protection against risk of collapse of structures, but would not guarantee that some damage to these and to contents would not be experienced during a major earthquake; further reduction of risk could be achieved through additional bracing precautions. Soil liquefaction and related phenomena are not considered to be generally present in the project area; site specific soils investigations would serve to identify local areas which have such potential, and recommend appropriate mitigating design. Problems of expansive soils may be mitigated by lime treatment or by pier and grade beam or deeper than normal foundations. Again, site specific engineering investigations would be required by the County Building Code.

b. Summary of Comments and Staff Responses

Most comments on this section were received in response to the June, 1982 DEIR. Additional discussion was included in the March 1983 Revised DEIR to respond to these.

D. Hydrologic Conditions

1. Summary of Findings in the DEIR

- a. Groundwater in the southern portion of the project area is generally less than 10 feet below the ground surface; in these areas, potential impacts are possible on site grading, particularly excavations, utility trenching, basement construction, and landscaping.

The project would include provision for on-site groundwater management so as to minimize these potential problems.

- b. Approximately 5,100 acre feet of treated (partially demineralized and blended) wastewater annually would be applied as irrigation on approximately 1,400 acres of landscaped areas within the project area. When extreme conditions (such as an exceptionally long, wetter-than-average winter followed by a cool spring and summer) occur, there might be more wastewater generated than the proposed disposal areas could accommodate.

The project incorporates two provisions to deal with this contingency. First, ponds would be provided on-site for the seasonal storage of treated wastewaters; and second, a "contingency" area located outside of but adjacent to the project area, and controlled by the project sponsor, could be used for irrigation as required.

- c. Potential adverse impacts on the chemical quality of existing local groundwater would be mitigated through demineralization to achieve acceptable mineral concentrations for spray irrigation disposal, and through the provision of adequately designed, fully lined brine ponds to prevent seepage loss.
- d. Irrigation disposal could impact the depth of the local water table. Where the water table is very shallow, additional recharge from applied wastewater could raise the water table to levels which would create problems for surface development.



The proposal for groundwater management would minimize these potential problems.

- e. Surface application of treated effluent (which itself would have acceptable quality) could cause an increase in the rate of lateral subsurface migration and/or seepage into surface drainageways of the ambient, poor quality groundwater. The associated impacts could include chemical degradation of high quality groundwater resources located downstream of the project area.

These potential impacts would be mitigated by provisions of the project proposal calling for on-site collection and demineralization treatment of groundwaters for reuse or for stream discharge.

- f. Development of Las Positas would cause some increase in storm flows in off-site flood control channels. Due to local topographic and hydrological conditions, however, the maximum flows from the planning area would not coincide with the peak flow in Arroyo Las Positas. Thus, the increase in the maximum discharge in Arroyo Las Positas resulting from the project would be minor.

## 2. Summary of Comments and Staff Responses

- a. Most of the comments regarding project groundwater, aquifer and permeability impacts pertain to the appropriateness and adequacy of the proposed wastewater and groundwater management program. These comments, and staff responses, are included in Section X, of this Summary.
- b. Regarding drainage and flooding impacts, the Department of Fish and Game (letter of May 9, 1983) comments that they are not convinced that peak stormwater runoff will not increase existing flooding and erosion problems downstream from the project, which could induce natural resource damaging flood control projects.

In response to this, the project engineering consultants have provided additional information to support the finding in the DEIR. Their rough calculations indicate that the maximum flow increase for Arroyo Las Positas would be about 6 percent, and the maximum flow increase for Arroyo de la Laguna would be about two percent as a result of the Las Positas development.

They note that Figure 4.11 in the RDEIR is an inaccurate way of comparing increases in flow, because all flows on the figure are based on different times of concentration. The time of concentration for the most remote spot in the Arroyo Las Positas watershed is about twice as long as that for the Las Positas development area, and about three times as long for the Arroyo Laguna watershed.

## E. Housing and Employment

### 1. Summary of Findings in the DEIR

#### Jobs/Housing Relationships

The Revised Draft Environmental Impact Report found that, under "Trend" projections of employment, developed by Planning Department staff, and projections of housing based on local general plan policies, there would be a very close balance, in the Livermore-Amador Valley and San Ramon Valley area between jobs and housing. The "Trend" projections of employment were prepared in the absence of an update of ABAG projections for the area. It was concluded in the RDEIR that there would probably be no demand for housing generated by local or regional employment growth in excess of projected housing supplies. It was also concluded that Las Positas would add to the total number of jobs and housing, but would not significantly change the overall jobs to housing ratio in the Valley area. Subsequently to the preparation and distribution of the RDEIR, ABAG completed its revisions to forecasts of regional forecasts of population, employment and housing. Data from these for the Livermore-Amador and San Ramon Valley area are included in this EIR. The general implications of the new projections for the Valley area are considered below, along with an expanded discussion of alternative assumptions regarding the potential effects of Las Positas on the overall balance between housing and employment.

Assessment of the potential effects which the proposed Las Positas project would have on projected amounts of housing and jobs in the Livermore-Amador-San Ramon Valley area, and on future relationships between housing and job needs, requires that certain basic assumptions be used regarding: 1) projected changes in housing and jobs which would take place in the Valley area without Las Positas, and 2) potential effects which the project would have on these projected changes, either to add to total housing and total jobs, or to cause a redistribution of residential and/or commercial and industrial growth in the Valley. ABAG's Projections '83 provides a



reasonable estimate of future changes in housing and employment which would occur in the Valley without Las Positas, and are used in this EIR. No market analysis has been submitted or developed to assess the effects which Las Positas might have on the distribution of residential, commercial and industrial development in the Valley. In the absence of such an analysis, two reasonable alternatives have been used in the EIR: first, that Las Positas would result in a simple addition of 18,000 new housing units and approximately 22,000 permanent new jobs (at buildout, year 2005); and second, that Las Positas would result in a redistribution of commercial and industrial development otherwise projected for the Valley area.

Planning Department staff's assessment of ABAG's most recent projections of population, housing and employment for the Valley area (in Projections '83) shows that, by year 2000, there would be an approximate balance between jobs and housing, or more precisely, between the total number of jobs in the Valley and the total number of employed persons who would be living in the Valley. Currently (1980) the ratio of jobs to employed residents is 0.74. By year 2000 the ratio would be approximately 1.03.

Should Las Positas result in a net addition of both housing and jobs, it would not significantly change the overall jobs to housing ratio for the Valley, insofar as the total number of jobs within the project would be approximately equal to the anticipated number of employed residents living in Las Positas (a jobs/housing ratio of 1.0). This assumption was used, and is considered "worst case," in the EIR analysis of project impacts, within the Valley, on transportation facilities, air quality, and water supply.

Should Las Positas result in a redistribution of projected commercial and industrial development (without any corresponding redistribution of projected housing) it would cause the Valleywide ratio of jobs to housing to decline, to 0.9. The principal adverse effect of such a redistribution of commercial and industrial development would be the loss, to other communities in the Valley, of potential property tax, sales tax, and other general revenues. Greater amounts of long-distance out-commuting, of residents to employment areas outside the Valley, could also be expected.

#### Housing Affordability

The DEIR noted the opinion of the project proponents that approximately 85 percent of the total housing proposed for Las Positas would be affordable to moderate and low income households.

Subsequent analysis by Planning Department staff and by the fiscal consultants, Angus McDonald & Associates, shows that only seven percent of housing prices would be affordable to moderate income households, and that none would be affordable to low income households.

2. Summary of Comments and Staff Responses

- a. A number of commenters dispute the use of "trend" projections of employment, prepared by staff, as the basis for the analysis of jobs/housing relationships:
  - 1) it argued that the "trend" projections are much lower than, and conflict with actual development activity currently underway in the Valley area (Wilsey & Ham, letter of May 13, 1983);
  - 2) it is argued that the EIR should use employment projections based on projects already planned or identified for the Valley Area (Wilsey & Ham, May 13, 1983; City of Livermore, May 16, 1983); and
  3. it is argued that the EIR should analyze and apply updated information from ABAG concerning regional employment and housing trends (City of Livermore, May 16, 1983)

In the Revised DEIR, the "trend" projections of employment were developed by Planning Department Staff as alternatives to a "projects-based" projection, and pending completion of the updated ABAG projections. ABAG's Projections '83, has since been completed and adopted; projections for the Livermore-Amador and San Ramon Valley area are included in this EIR (See, in particular, the response to Comment D.1.0, in Section IV).

- b. It is argued that the basic employment growth proposed for Las Positas would constitute a redistribution, rather than a net addition to employment otherwise projected for the Valley area (Wilsey & Ham, May 13, 1983).  
Staff agree that this is possible. However, no market analysis has been submitted or developed to test this assertion or, more importantly, to test the assertion that Las Positas could successfully compete with other projects in the Valley to attract new commercial and industrial establishments.



- c. It is argued that the housing demand associated with employment generated by commercial and industrial development in the Valley area (as well as from economic growth elsewhere in the region) will exceed the projected Valley housing supply, resulting in a "housing shortfall" (Wilsey & Ham, May 13, 1983)

Staff agrees that this is a possibility if employment growth in the Valley area is substantially higher than is now projected by ABAG. In the absence of a comprehensive market demand analysis to support this alternative assumption, staff recommends use of ABAG's Projections '83 to assess future jobs/housing relationships. Staff's interpretation of these is that, by the end of this century the Valley area will, without Las Positas, have an approximate balance between jobs and housing (employed residents).

- d. It is argued that the EIR should analyze the environmental and fiscal impacts resulting from the total projected increase in employment in the Valleys, including that proposed for Las Positas (City of Livermore, May 16, 1983).

Staff agrees that the project must be evaluated in the context of both existing and projected conditions, in order to establish the net effects of the project over time. In the EIR, these future conditions have been presented as alternatives where there are uncertainties or reasonable differences in opinion. Staff does not agree that it is the required function of the current EIR to evaluate, in detail, the broad range of impacts associated with these changing conditions. However, a number of significant cumulative impacts are addressed in this EIR, relating to water supply and demand, traffic, and air quality.

- e. The conclusion in the DEIR that Las Positas would not significantly affect the jobs to housing ratio for the Valley area is disputed. (City of Livermore, May 16, 1983). It is also noted that if complete buildout of the proposed commercial and industrial areas is not achieved, it is possible that there would be an internal "shortfall" of jobs relative to housing (ABAG, May 16, 1983)

It is important to distinguish between the project's effects on the total number of jobs and housing units in the Valley, and its effects on the future ratio of jobs to housing. If completed as proposed, and if it did not cause any significant redistribution of either residential or commercial/industrial

growth in the Valley, the project project would add to the total number of jobs and housing units, but would not effect on the Valleywide ratio of jobs to housing. We agree that the Valleywide jobs to housing ratio would be effected if the Las Positas project caused redistribution of projected commercial/industrial development without a corresponding distribution of projected housing (or the converse).

We also agree that it is speculative, at this time, to assume complete buildout, on schedule, of the proposed employment areas in Las Positas. The success of the project would very much depend on the achievement of the proposed goals for commercial and industrial development. This would require the County, and in particular, the Board of Supervisors to assume major new responsibilities, both to manage and promote employment-generating development within Las Positas. Whether it can or should assume these responsibilities is a major policy decision which the Board must consider in its deliberations on the project.

- f. It is requested that the EIR be clarified to distinguish between developers' costs and the sales prices of units. (ABAG, May 16, 1983).

The project sponsors were asked to provide clarification, and indicate that the sales price figures included in Table 5.24 of the RDEIR are the anticipated sales prices, and not the costs of the developer building the housing units. These prices would be comparable with the selling prices of other similar units in the County. A new table has also been prepared giving a breakdown of construction, financing, and unit infrastructure costs for each housing type (Refer to the response to Comment D.4.6, in Section II.B).

- g. Several comments were made regarding the actual affordability of housing in Las Positas to low and moderate income households. 1) ABAG comments that consideration should be given the likelihood that, although the project would provide lower income employment, it may not provide commensurate housing opportunities for lower income households. 2) They also note that the additional per unit utility and maintenance expences may make much of the housing in Las Positas even less affordable to these income groups (ABAG, May 16, 1983).

In dealing with these and other similar comments, Planning Department staff, with the assistant of the fiscal consultants



(Angus McDonald & Associates) prepared additional analysis to test the statement of the planning consultants to the project sponsor, that 85 percent of housing would be affordable to low and moderate income households. Our conclusions are 1) that the statement was based on very optimistic assumptions regarding future mortgage interest rates, household incomes, and the percentage of household incomes that would be available for housing costs; 2) that, with more reasonable assumptions regarding these variables, most of the housing prices would only be affordable only to "Above Moderate" income households, or to those with annual incomes of \$38,000 or more; and 3) that no more than seven percent of the housing would be affordable to moderate income households and none would be affordable to low income households (Refer to the response to Comment D.4.7, Section IV).

In response to the specific points raised by ABAG:

1) Only general information on the types of commercial and industrial development (and corresponding types of jobs) which would locate in Las Positas can be developed at this time.

2) Costs of major capital improvements would be a part of, rather than an addition to the stated housing prices. These sales prices would be relatively fixed if residential developments in Las Positas are to be competitive with projects elsewhere in the market area.

Average annual fees for sewage, potable water, and street lighting are estimated to be approximately \$43 per month per unit initially, declining to \$40 per month at project buildout. These fees would represent about seven percent of total housing costs of the least expensive unit, and we do not conclude that these would, in themselves, adversely effect the "affordability" of the units.

## F. Public Plans and Policies

### 1. Summary of Findings in the DEIR

The project proposal to provide a number of services through a County Service Area would not be fully consistent with adopted County General Plan policies encouraging all new urban development to be municipal, or with Local Agency Formation Commission priorities favoring annexation to an existing city, first,

annexation to an existing services district, second, and formation of a new special services entity, third. Some mitigation of conflicts with County Plan policies may be achieved through provisions allowing and/or encouraging eventual incorporation, if annexation to an existing city is not possible.

2. Summary of Comments on the DEIR and Staff Responses

- a. The project's nonconformance with the County General Plan is noted. The City of Livermore (May 16, 1983) recommends that the EIR should include further assessment of valleywide impacts which would be associated with General Plan amendments which would be required if the project were approved as proposed. They also recommend that the EIR analyze mitigation measures or alternatives that could eliminate inconsistency with these Plan policies.

Staff concludes that these types of impacts are now evaluated in the EIR, under Growth Inducing Impacts.

- b. Further analysis of project consistency with adopted Elements of the countywide General Plan, particularly the Open Space Element, is recommended (City of Livermore, May 16, 1983).

The Livermore-Amador Valley Planning Unit General Plan (a part of the County of Alameda General Plan) was used in the DEIR as the principal document against which to measure project consistency or inconsistency with the County General Plan. The Livermore-Amador Valley Plan was adopted in 1977 as a comprehensive and self-contained statement of urban development and open space/environmental management policy for the Planning Unit, and constitutes the primary statement of County policy for that Planning Unit.

- c. There is disagreement with the DEIR's treatment of ABAG policy. Further analysis of project consistency with ABAG's Regional Plan Urban Development Strategy is recommended (ABAG, May 16, 1983).

This additional analysis is provided in response to comment E.3.1, in Section IV of this document. There it is concluded, by staff, that: 1) the project would not be consistent with the premise of the Urban Development Strategy that urban development take place in and around existing cities in which facilities and services are available or committed; 2) the Las Positas development would be consistent



with the premise of the UDS that living, working and shopping be provided within the same community; and 3) the project, while providing a mix of housing types, would not significantly improve housing opportunities for low and moderate income persons. The need for a coordinated, comprehensive, valleywide planning effort is acknowledged.

- d. Further discussion relating to the required Williamson Act cancellations is recommended by the City of Livermore (letter of May 16, 1983):

- 1) it is recommended that further analysis be included regarding the environmental effects of the cancellations;
- 2) it is also recommended that the EIR more fully evaluate the conformance of the petitions to cancel Williamson Act contracts with applicable provisions of the Government Code.

- 1) Two principal factors will affect the economic viability of farming in the area: farming costs, including property taxes; and the amounts of productive land which are available for farming.

Cancellation of the Williamson Act contracts would result in a back-taxes fee and in increased ongoing taxes. Both of these would reduce the economic viability of farming in the area. This impact could be mitigated by postponing contract cancellations until such time as the effected properties were slated for urban development.

As noted in Section 5.1 (p. 5-27) of the Revised DEIR, most of the project area is farmed by growers who use this land in conjunction with other property in order to generate sufficient income to support their families. The loss of productive land to urban development would, therefore, adversely affect the farming incomes of these families. This impact cannot be mitigated by the County. Permanent loss of agricultural production would result if project area production is not, or cannot be relocated elsewhere. Some mitigation of project impacts on the general economic viability of farming in the area could be achieved by staging urban development such that "workable" units of farmland were retained through most of project buildout.

- 2) The EIR indicates, as is required by law, that

cancellation of several Williamson Act contracts would be required in order to implement the project. It is the function of the EIR to identify impacts resulting from such actions. Staff does not agree that the EIR must include a determination of the conformance of the proposed cancellations with applicable Government Code requirements. The Board of Supervisors would determine if statutory conformance is met by any petition based upon its judgment of supporting evidence submitted with each petition.

#### G. Police Protection

##### 1. Summary of Findings in the DEIR

The project would require the addition to the Sheriff's Department of 88 badge personnel, including 66 in approximately 10 patrols; an estimated 13 new patrol vehicles would eventually be required to serve the development. Service to the Livermore-Amador Valley is now provided out of the Sheriff's Eden Township Substation. The proposed development may require re-opening of facilities in the Valley (i.e., the Santa Rita Substation) until such time as a station is provided in the Las Positas area.

Impacts could also be felt by the Livermore Police Department, since a portion of the Las Positas population would be attracted to commercial and recreation uses in the city, resulting in added City police calls. City mutual aid responses to the project area would also increase.

An estimated nine additional California Highway Patrol officers, and three patrol vehicles would be added to serve the proposed development at buildout.

Impacts on the City and the CHP are not directly mitigated. Fiscal impacts on the County Sheriff's Department could be mitigated through the establishment of a special tax levied at Las Positas.

##### 2. Summary of Comments and Staff Responses

- a. The Sheriff's Department has submitted additional clarification regarding staff requirements. Badge personnel would require a 30% support staff, or around 27 for the projected 88 badge positions. They also note that two county-wide criminal justice services would be impacted. These are the County Crime Laboratory, for which Las Positas would require an additional Criminalist and support analytical



equipment, a vehicle and vehicle equipment, and office space, and the General Identification Bureau, for which Las Positas would require two additional personnel.

This clarification is acknowledged. Because Sheriff protection and criminal justice services costs were estimated on a per capita basis, no change in the fiscal analysis is required.

## H. Fire Protection

### 1. Summary of Findings in the DEIR

Three new fire stations would ultimately be required. Project sponsors propose the use of the sponsors' advance and of development fees to cover capital costs, and of the existing Structural Fire Fund to cover operation and maintenance costs. However, because the Fire Fund was not originally intended to finance an urban level of fire protection service, a fire protection special tax could be established to cover ongoing operations.

### 2. Summary of Comments and Staff Responses

A number of comments were made on the discussion of fire protection contained in the June, 1982 DEIR. These are reflected in changes in the section in the March, 1983 Revised DEIR. No significant comments were received regarding the discussion of fire protection services contained in that latter document.

## I. Education

### 1. Summary of Findings in the DEIR

A total of eight elementary, three intermediate, and two high schools would be needed, at project buildout, to serve the student population projected for Las Positas. Project sponsors propose that the school facilities be funded through development fees.

### 2. Summary of Comments and Staff Responses

- a. There is disagreement that either the proposed means to finance new school construction, or several alternative means identified in the DEIR, would adequately assure that funds will be available when and where they are needed (Livermore Valley Joint Unified School District, April 22, 1983).

The fiscal consultants to the County agree with the comment of the District. First, developer fees, as proposed by the sponsors, would not be reliable because of uncertainties about the time of collection due to changes in the rate of development. Second, the alternative of the State Building Fund would not be reliable because of the competition for funds with other districts. Finally, a Special Assessment District cannot be used in California for facilities such as schools.

The fiscal consultants conclude that a Community Facilities District (Mello-Roos) could be a practical and reliable mechanism for financing school construction. There may be some uncertainty about this mechanism in that it has only recently been used (Chino Hills in Riverside County). They stress that an enforceable agreement must be in place to provide for schools before each phase of development in Las Positas is authorized.

- b. Other comments on Schools, by the District and others, pertain primarily to fiscal impacts and mitigation. These are summarized in Section O. of this Summary.

## J. Library

### 1. Summary of Findings in the DEIR

During the earlier phases of development, prior to construction of a library in the proposed Las Positas development, impacts could be felt by other public libraries in the Valley, and particularly those in the City of Livermore. These potential impacts could be mitigated through the interim use of bookmobile services.

### 2. Summary of Comments and Staff Responses

Comments on this item pertain primarily to the fiscal impacts of Las Positas, and of the proposed and alternative financing plans, on the County Library System and on the City of Livermore. These and staff responses are included in Section X.

## K. Water Supply

### 1. Summary of Findings in the DEIR

If state water project facilities are developed to provide full



entitlements to Zone 7, it is expected that there would be sufficient water supplies in the long-term to serve the proposed Las Positas development in addition to other projected growth in the Livermore-Amador Valley. In the Revised DEIR, the conclusion was reached that, if these entitlements cannot be provided, it is expected that deficits in water supplies would occur with the addition of demand from Las Positas. Further input from Zone 7 indicates that these deficits would probably be minimal, and could be made up by temporary augmentation by groundwater supplies.

## 2. Summary of Comments and Staff Responses

- a. Further analysis of the impacts of the project upon groundwater levels in the Central Livermore Basin is recommended. It is felt that, if projected water demand with Las Positas were to exceed available water supplies an overdraft of the groundwater in that basin could occur (East Bay Regional Park District, May 9, 1983; City of Livermore, May 16, 1983).

Staff asked the staff of Zone 7, Alameda County Flood Control and Water Conservation District, to comment on this issue. First, they state that under projected normal demand conditions the expected average import supply for the most part should be adequate. If less than average supply were available, then the normal demand would have to conform to available supply, or the import supply would have to be augmented by groundwater supplies. Such withdrawals would not be expected to be required year in and year out. If withdrawals are made, it can be expected that it would be made up or replenished by groundwater recharge in wetter years. They do not envision the groundwater basin to be subjected to an overdraft (long-term deficiency) condition unless an uncontrollable, sustained withdrawal were to occur. They note that the Zone's groundwater replenishment program over the last twenty years has "banked" a significant volume of water which could be relied upon during water supply shortage periods. They further note that, even if the basin's level were to be lowered by pumping to its former low, the impacts would probably not be significant.

- b. The methodology used in the RDEIR to estimate water demand from Las Positas is challenged (City of Livermore, May 16, 1983).

The use of "per capita" rates of water consumption, as was the

case in the DEIR, is a relatively standard way of measuring community water demand. The rates are expressions of consumption for mixes of urban uses, including industrial, commercial and institutional, as well as residential uses. For comparison, an estimate of water demand using use-specific rates of consumption has been prepared and is included in this EIR (see the response to Comment 1.3.1).

## L. Wastewater Treatment and Disposal

### 1. Summary of Findings in the DEIR

Primary impacts relate to local and off-site groundwater conditions; these are discussed in Section D of this Summary. The sanitary sewage system, as proposed, would also have the potential of contaminating groundwater through pipe breakage or tank leakage. These impacts could be mitigated through maintenance programs and through selection of particularly strong, leak-proof tank linings.

### 2. Summary of Comments and Staff Responses

- a. A number of commenters maintain that export of wastewater would be the most desirable disposal option, which should be considered as a potential disposal alternative, or required for the project (Sierra Club, letter of April 25, 1983; Regional Water Quality Control Board, May 3, 1983; Zone 7, May 13, 1983; City of Livermore, May 16, 1983; ABAG, May 16, 1983).

This wastewater disposal alternative is identified and briefly discussed in the DEIR. Preliminary cost comparisons for a pipeline versus demineralization appear to favor export.

The Regional Water Quality Control Board will not (under adopted policy) permit new on-site wastewater disposal systems unless a feasibility study of export is completed first and export is shown to be infeasible. Preliminary studies of the type desired by RWQCB to increase export capacity have been done by LAVWMA, Zone 7 and jointly by DSRSD/Pleasanton: the County Board of Supervisors has officially requested to join the DSRSD/Pleasanton study. Should the County choose to approve a Plan amendment for the Las Positas area, it could establish wastewater export as the preferred or required disposal alternative. Similarly, it could require that the



project (sponsors or other parties) underwrite some of the costs of the export study as well as costs for export facilities. .

- b. It is recommended that further information be included in the EIR to clarify, and to verify the effectiveness and adequacy of elements of the proposed wastewater and groundwater management systems. (RWQCB, May 9, 1983; EBRPD, May 9, 1983; Zone 7, May 13, 1983; Alameda County Water District, May 12, 1983; City of Livermore, May 16, 1983).

Supplemental material is included in this EIR document. Refer to the response to Comments J.2.2, J.2.3, and J.2.4, Section IV for a discussion of the required land area requirements of the proposed wastewater and groundwater management systems. The engineering consultants maintain that, for current planning purposes only groundwater drainage quantities under operating conditions are needed to establish preliminary groundwater control requirements. It is acknowledged that more details would need to be specified, and more data on subsurface conditions collected before the proposed system could be approved by the RWQCB or Zone 7. An outline of these required additional studies is given on page 4-43 of the RDEIR.

The reliability of the proposed wastewater treatment facilities, including the proposed reverse osmosis system is discussed in some detail in Section 5.5 of the RDEIR. Additional information is provided in response to Comment J.8.4.

- c. It is recommended that additional information be provided on the per unit costs of constructing and operating the wastewater and groundwater management systems (County of Alameda Public Works Agency, May 17, 1983).

These costs are presented in response to Comment J.9.1.

## M. Streets and Highways

### 1. Summary of Findings in the DEIR

The transportation analysis in the Revised DEIR concluded that the project, in combination with other proposed development in the vicinity and in the Livermore-Amador Valley, could result in system-wide congestion during peak travel periods. Capacity

conditions would be expected on many of the major arterials, freeway sections, and freeway ramps; these conditions could cause peak-period traffic volumes to spread over several hours.

The DEIR identified several features of the project which would help to reduce traffic impacts. These include local employment opportunities as well as local commercial, recreational and public institutional facilities. The proposal included a site for a transit terminal, near the proposed Town Center, which could serve as a station for BART express buses and local transit (or possible station of a BART fixed rail extension to the Valley). The project would also include a system of pedestrian/bicycle/equestrian trails. A series of Transportation System Management measures, such as the provision of local transit service, programs to encourage van-pooling and ride-sharing and flexible working hours among businesses and industries, were identified; these would be managed by a TSM coordinator. A number of physical improvements to road facilities outside the project area would also be required. The measured effect of these, indicated in the DEIR, was the partial correction of projected traffic impacts; nevertheless, the analysis showed that, in a number of locations, the long-term impacts of the project would not be fully mitigated by either TSM or the proposed off-site facilities improvements.

The need for a valley-wide traffic study is identified in the DEIR. This would provide more detail than was developed in the DEIR analysis, so as to precisely define potential impacts of Las Positas and of other major traffic generators in the Valley. The study would provide a basis for assigning responsibility for the costs of required improvements to regional facilities. If the proposed Las Positas Plan amendment and rezoning are approved, the DEIR also recommends that provision be made for periodic review of regional and project traffic levels to more accurately address changes in these, and to serve as the basis for facilities improvements and/or adjustments in the project itself.

## 2. Summary of Comments and Staff Responses

- a. Caltrans (letters of July 30, 1982 and May 5, 1983) recommended that a number of changes be made to the DEIR traffic analysis:
  - 1) They advised that projections of traffic should include baseline as well as traffic generated by other approved or proposed developments in the Valley. They recommend that the analysis include separate tabulations of



regional traffic projections (existing plus increments due to regional, Bay Area, growth factors), cumulative local traffic (from the Valley), and project traffic, and that the cumulative effects of these three categories be shown.

- 2) They advised that the analysis should consider both AM and PM peak hour traffic volumes, in order to undertake an adequate capacity analysis of facilities. and
- 3) They recommended that trip distribution should be determined by means of a gravity-type model, involving all production and attraction volumes, including all proposed developments as well as established employment and residential areas, and travel impediments.

In the Draft EIR and Revised Draft EIR, the transportation analysis was based primarily on an extrapolation of trends, and assumptions derived from available research which had been conducted for similar-large scale projects. Comments received from Caltrans, and from other agencies and organizations indicated that a more detailed and refined transportation analysis was needed. As a result a additional analysis of project transportation system impacts, and of potential mitigation, was prepared. These materials are included as an Appendix to this EIR, and are summarized here.

The revised analysis bases the traffic impacts and resultant mitigating measures on the results of application of a computer model which forecasts and assigns anticipated traffic generated by the project, by other projected development within and adjoining the Livermore-Amador and San Ramon Valleys. The assessment is intended to indicate both what the net traffic impacts of Las Positas would be, and what would be needed to eliminate or at least reduce these impacts. To this end forecasts with and without Las Positas were developed, considering factors which influence traffic characteristics: future population and employment; the location and density of population and employment; the traffic capacity of the existing transportation system, and the added capacity that would be made possible by improvements to the system.

Because the analysis must consider changes in these factors over both the short- and long-term, two levels of analysis were conducted, one for Phase I, and the other for eventual project build-out in the year 2005. The analysis was

conducted for a "worst case" future scenario, insofar as Las Positas was treated as a net addition, rather than a possible redistribution of housing, population and employment otherwise projected for the Valley. Further, and unlike the analysis in the Draft and Revised Draft EIR, no allowance is made for potential effects of carpooling, transit and other TSM measures, which, if successfully applied, could account for a 10 percent or greater reduction in future traffic volumes forecast.

To evaluate the net effect of the Las Positas development on the Valleywide transportation network, it was necessary to forecast a year 2005 level of traffic. These forecasts were based on ABAG's most recent year 2000 projections of housing, population and employment, which were extrapolated to year 2005. It was also necessary to forecast changes to the Valleywide roadway system. In preliminary forecasts by the consultants (Las Positas Transportation Analysis, September 1983) it was initially assumed that this system would include improvements that are both committed and under consideration regardless of the Las Positas proposal. Their analysis, however, showed that these anticipated improvements would not be sufficient to accomodate projected traffic volumes, without Las Positas, at reasonable levels of service ("D" Level or better during Peak Travel Hours). They concluded that a comprehensive transportation study for the Valley would be necessary to establish basic objectives and proposals to deal with this potential situation. In the absence of such a study, and in the absence of a comprehensive transportation plan, two basic assumptions were necessary to evaluate the "net" impacts of Las Positas on future traffic conditions, and to indicate the net responsibilities of project for mitigation of these. It was assumed that a "D" or better level of service, at peak hours, would be the fundamental standard for operations of all major roadway facilities. And second, it was assumed that, with increases in population and employment in the Valley and corresponding increases in traffic volumes, all necessary improvements to the roadway system would be made in order to maintain this standard.

Three long-range (year 2005) scenarios are analyzed; one without and two with Las Positas. For each, figures are provided indicating AM and PM peak hour traffic volumes along freeways and major arterials in the Valley area, and tables are provided indicating, for links in the roadway system, existing lanes, projected volumes, and the projected number of



lanes which would be required to maintain a "D" level of service.

The first of the three scenarios evaluates year 2005 conditions with projected growth based on the extrapolated ABAG Projections '83, and with improvements to the roadway system required to accomodate traffic generated by this growth (at "D" LOS or better). Preliminary planning estimates of costs are: \$40 million, for improvements to existing arterials in the Valley; \$27 million for the construction of new arterials; and \$640 thousand for improvements to arterial intersections. In addition, I-580 freeway would need to be widened, from an existing 8 lanes, to 10 lanes (from Portola Avenue to Kitty Hawk Road) and 12 lanes from Kitty Hawk Road east to I-680.

The second scenario, traffic generated by the Las Positas project is loaded onto the improved, Valleywide system described above, in order to identify locations on this system where the project would have adverse impacts.

In the third scenario, the consultants include a series of proposed improvements to the year 2005 "without Las Positas" roadway system, which improvements would be needed to reestablish a "D" or better level of service (Peak Hour). The additional costs for these improvements, which would need to be funded solely by the Las Positas project are estimated to be: \$3.6 million for improvements to existing arterials; \$3.5 million for new arterial improvements; and \$1.6 million for improvements to arterial intersections. I-580 would need to be widened further, up to 16 lanes along certain sections.

A separate analysis was prepared for I-580 freeway, in which three alternates were developed to show three possible ways of accomodating projected traffic (the consultants note that the alternates were not analyzed in detail, but were developed to describe a range of possibilities; a much more detailed evaluation, beyond the scope of the current EIR, would be required to determine the actual freeway and interchange configurations). The consultants estimate that total improvement costs for I-580, including right-of-way, would be between ninety and one hundred and twenty million dollars. Approximately 40 percent of this would be attributable to traffic generated by Las Positas.

The analysis includes a review of the feasibility of the

mitigating measures. Improvements needed to the freeway, arterials and intersections to attain a LOS D in 2005 would involve much widening and new construction. They conclude that, physically, each of the facilities improvements proposed can be built; there are no physical problems such as grades, bodies of water, intersection spacing, or soils that would prevent any of the improvements from being made.

From a fiscal point of view, the costs of the improvements for arterials would represent a significant part of the capital improvement budgets of local governments in the study area, and possibly that of the state for freeway improvements, over the next twenty year. The estimated cost to Las Positas for off-site roadway improvements would total approximately \$55 million.

In terms of increased traffic, possible taking of homes and businesses, and disruptions due to construction, the proposed measures could have a considerable effect on residents of the area. However, many of the adverse impacts would be caused by projects needed to accomodate the traffic growth expected without Las Positas. Without a program of public information and involvement associated with a comprehensive planning effort, the full social impacts cannot be well-estimated. Tradeoffs among growth, accessibility, congestion, stability and quality of life in the area for its residents can only be ascertained by ongoing, comprehensive planning efforts.

- b. As noted in Section A of this Summary, a number of comments dispute the following assumptions which were basic to the traffic analysis in the June 1982 and March 1983 Revised EIR documents:
- 1) the assumption that 60 percent of peak hour and 65 percent of average daily traffic will be internal to the Las Positas project;
  - 2) the assumption that 80 percent of Las Positas employees will live within the project; and
  - 3) the assumption that Transportation System Management System (TSM) strategies would reduce traffic effects up to 25 percent (City of Livermore, May 16, 1983; ABAG, May 16, 1983; BAAQMD, May 16, 1983).

These assumptions were not used in the revisions to the



transportation analysis. To the points raised above:

- 1) One of the key findings of the revised analysis was the percentage of Las Positas traffic which would remain on-site; approximately 29 percent would be internal, and 71 percent external to the project area. This was developed directly from trip tables of production and attraction trip-ends from zones in the Livermore-Amador and San Ramon Valley area.
- 2) The computer model used population, housing and employment data based on ABAG's Projections '83. Only general information on types of project area employment could be developed at this time. However, more detailed information (i.e., relating housing costs to household incomes) was not essential to the analysis.
- 3) The current EIR has included additional, and more detailed discussion of potential effects of TSM strategies in reducing traffic. However, and as noted in the discussion of revisions to the transportation analysis, no allowance was made for the potential effects of TSM in evaluating project traffic impacts.

## N. Air Transportation

### 1. Summary of Findings in the DEIR

The project would generate demand for approximately 175 general aircraft spaces at the Livermore Municipal Airport, this would be in addition to the expansion currently planned. The project would also accelerate the need for other airport improvements, such as the proposed second parallel runway.

### 2. Summary of Comments and Staff Responses

The Alameda County Airport Land Use Commission comments that they feel the impact of the project, requiring acceleration of the need for additional improvements to the Livermore Municipal Airport, would constitute a significant adverse impact.

Any additional aircraft storage facilities, to accommodate demand generated by Las Positas, would need to be approved by the City. The capital and maintenance costs of these could be partially offset by user charges.

X. Fiscal and Administrative (CSA and Alternatives)

1. Summary of Findings in the DEIR

a. Capital Costs and Financing

The sponsor's propose that: a County Service Area be created to provide some infrastructure and municipal services, and to collect fees to finance infrastructure provided by other public agencies; all subdividers be charged a fee for the purchase of lands needed for public uses; all builders be charged a fee for the construction of public infrastructure; and the project sponsor advance the County an amount (approximately \$14 million) to finance infrastructure and land acquisition required prior to the receipt of fees, which amount would be repaid from available surpluses in the Capital Improvement and Public Land Acquisition funds. Potential impacts of this proposed financing program are: 1) the initial burden of the capital costs would fall on landowners and developers, and could possibly lower land prices and limit their profits; 2) these costs would be passed forward to future residents and businesses, with most of the cost increase financed at mortgage interest rates rather than typically lower municipal bond interest rates; 3) there is the possibility that deficits in the fund balance may occur, delaying the capital building program and requiring subsidies from the County or other existing public service agencies; and 4) the use of a land purchase fee which would be directly proportional to purchase price may be legally questionable under Proposition 13.

The potential fund balance impacts could be reduced or eliminated by increasing the Sponsor's advance and/or by eliminating the pay back. If the sponsor and other benefitting landowners agreed to finance all fund balance deficits which could occur during buildout, the potential impact would be mitigated; the per unit cost of the public land fee and the development fee would be reduced by eliminating the pay back provision.

Two alternative capital financing approaches have been identified which do not share the risks or potential impacts of the proposed financing program. These are: a conventional special assessment district, and a Community Facilities District.



b. Ongoing Costs and Revenues: County Service Area

It is proposed that a County Service Area be established to finance the ongoing operation of most local infrastructure and to administer capital funds distributed to other agencies. The CSA would be governed by the County Board of Supervisors, which would assume new responsibilities for management of the urbanizing area. Insofar as these new responsibilities impinge upon the Board's agenda, other County issues may not receive timely attention, resulting in an impact upon other County residents.

Revenues for ongoing costs would be entirely derived from user charges. Any initial deficits would be offset by a portion of the Sponsor's advance. Over time, surpluses would be eliminated by reducing user charges or by allocation of these to the Capital Improvement Fund.

The impact on the Board of Supervisors, at least for the first few years, appears unavoidable.

c. Ongoing Costs and Revenues: Alameda County General Government

The County of Alameda would provide key public services to the proposed development, including those provided on a County-wide basis, such as general administration, public health, and social services, as well as urban services, such as police and fire protection, road maintenance, and library services, normally provided by municipal governments. These would be administered through the General Fund, Road Fund, Library Fund, and, as proposed, the Structural Fire Fund.

On the basis of fiscal assumptions included in the DEIR analysis, the proposed Las Positas development would result in a negative fund balance for General Fund services in 16 of 20 years; these result not only from assumptions about costs, but also would be due to the high proportion of residential uses compared to amounts of proposed commercial and industrial uses. The Road Fund would show a surplus only during the first phase of development; subsequent phases would not produce revenues adequate to cover road maintenance costs. This problem is not unique to Las Positas. The Library Fund would show a positive fund balance for each but the first year of project buildout. The Structural Fire Fund would show negative fund balances for 12 years of the buildout period, with cumulative deficits for each phase; this could be eased

through additional revenues from the County's Augmentation Fund. Following buildout, positive fund balances should stabilize; property tax revenues, which would increase steadily throughout buildout, would cease growing in constant dollar terms; other revenue sources would generally keep pace with inflation; it is likely that Social Service and Health Service costs would increase. This could result in County costs in excess of revenues, leading to possible reductions in service. The Road Fund would continue showing substantial deficits. The Library Fund should continue generating surplus revenue.

The projected General Fund deficits could be eliminated by financing all or part of the Sheriff's services with a special tax levied at Las Positas, through a Community Facilities District, for example. Another approach would be to include more industrial and commercial land, if the market would support such uses, or to demonstrate that related off-site land uses would produce offsetting revenues to the General Fund. A Community Facilities District could also be used to impose a special tax for fire protection. The newly-created fire protection agency would have no connection with, and would not exhibit the deficits shown in the Structural Fire Fund. Road Fund deficits in the proposed project would be only a part of an overall pattern County-wide. The County Road Fund as a whole would require additional revenues; General Fund transfers could be required to avert substantial reduction in County road maintenance. The impact within Las Positas could be mitigated by imposition of Road Maintenance Benefit Assessments.

d. Ongoing Costs and Revenues: Public Service Agencies Other than Alameda County

The proposed development would also be directly served by the Livermore Valley School District, the Livermore Area Recreation and Park District, and the Alameda County Flood Control and Water Conservation District, Zone 7. The development would also affect services provided by the adjacent City of Livermore and by the East Bay Regional Park District. The key impact of Las Positas upon the School District relates to the demand for new school facilities, rather than operations. Ongoing revenues for education would be generated from the allocation of a portion of the property tax supplemented with state aid. Park maintenance costs generated by the development are projected to exceed revenues



during the first phase of the project; subsequent phases are shown to produce positive cashflows. The adjoining recreation district, the East Bay Regional Park District, could receive additional use of its facilities; The District would receive no tax revenues from the proposed development, and may be negatively affected; costs of this additional service would be borne by residents within the Regional Park District. The City of Livermore would be affected by development of Las Positas in several ways: Las Positas residents would depend in part on commercial services in the city, which would add to the city's sales tax revenues; public services provided by Livermore, and particularly transit service and libraries, would also be affected.

Initial fund balance deficits for the Livermore Area Recreation and Park District could be offset by a fund transfer from the proposed Las Positas CSA operating contingency fund. Another approach would be to reduce or eliminate charges made by the CSA to LARPD for irrigation water (treated wastewater). The small fund balance deficit shown for Zone 7 for the first year of Phase I would also be offset by such a transfer from the contingency fund. There is no standard fiscal mechanism for mitigating the impact of the proposed development on the City of Livermore's library through financial support from Las Positas to the city. It would be possible, however, to eliminate some or all of the proposed problem by building a new library in the Las Positas area during Phase I.

## 2. Summary of Comments and Staff Responses

- a. The comment is made that the report should consider the potential problem of the County becoming involved in the provision of urban services, instead of requiring that these be provided by a municipality (LAFCO, May 11, 1983; Public Works Agency, May 16, 1983)

This issue is treated in Section 5.8 of the DEIR. As noted there, and as summarized above, the project would primarily impact three County agencies - the County Administrator's Office, County Public Works Agency, and Planning Department - and the Board of Supervisors. The agencies could add staff to offset impacts on their level of service to other County residents. However, insofar as its management of the Las Positas CSA would infringe upon the Board of Supervisors' time and agenda, other County issues may not receive timely

attention, resulting in an impact upon other County residents.

- b. It is noted that the proposal would put the County in the position of being the developer, or promoter of the project, such that there would be conflicts between its functions of controlling and assuring adequate development, and its necessity to promote the Las Positas development (LAFC).

Staff agrees with this conclusion. To an extent, certain of these potential conflicts could be resolved by requiring that development agreements (between the County, and landowners and developers in the Las Positas area) be negotiated prior to each phase of development, so as to resolve at the outset any uncertainties regarding financing and responsibilities of the sponsor, individual landowners, developers, the County and other agencies.

- c. It is recommended that a separate and specific alternative be reviewed providing for annexation to the City of Livermore (City of Livermore, LAFC, ABAG)

This alternative is identified and briefly discussed in the DEIR, but is not treated in detail. Some additional discussion is provided in Section IV, in response to Comment 0.2.4. CEQA emphasizes identification of alternatives with lesser environmental impacts. Staff concludes that while the annexation alternative may be more consistent with adopted planning policies (City of Livermore, County of Alameda, ABAG), certain fundamental impacts of the project, as it is proposed by the sponsors, would remain whether the area were served by the City or by a CSA.

- d. There is a concern that measures to mitigate project impacts would be enforced only so long as the County Board of Supervisors, which adopted them, remained in control of the development process; there is no assurance that these measures would be implemented if the CSD board were locally elected or if the area incorporated (ABAG, May 16, 1983).

Staff generally concurs with the comment; this is an issue in any developing unincorporated area. However, while a new city would not be fully bound to all the conditions established by the County for mitigation of development impacts, the city would nevertheless be required (in its General Plan, for example) to address and deal with the same range of social, economic, environmental and political issues which would



confront the County.

- e. There is a concern regarding the impact of the establishment of assessment districts upon existing landowners (Residents of Bel Roma and May School Roads). The fiscal consultants advise that an assessment district could be established so as to exclude certain parts of the project area until such time as these areas develop. It is also possible to include these areas, but to exempt them from any development fees, again until such time as they develop.
- f. The Board of Education of the Livermore Valley Unified School District (letter of April 22, 1983) and the Livermore Committee for Quality Education (address of April 25, 1983) argue that there must be a guarantee, prior to any approval of the Las Positas development, that adequate school facilities will be available when and where they are needed. They conclude that the alternatives for school construction financing identified in the DEIR do not adequately provide these guarantees and assurances.

Several alternatives, use of developer fees, reliance on the State Building Fund, or use of a special assessment district, were reviewed in the DEIR. The first two of these would be unreliable sources of construction funding. The third cannot be used for facilities such as schools. The consultants conclude that a Community Facilities District (Mello-Roos) could be used, although there is initial uncertainty about this mechanism since it has yet to be used in California or validated by any court. They stress that an enforceable agreement should be in place to provide for needed schools before each phase of project development is authorized.

- g. Several comments requested further discussion of the assumptions incorporated into the fiscal analysis (e.g., relating to projected property tax revenues). Further clarification is provided in responses to comments in Section IV.
- h. Gruen Gruen & Associates comment that many of the costs of the project (e.g. carrying costs of infrastructure borne by developers and builders, which in turn would be passed forward to and financed by future residents at private market mortgage interest rates) are characteristic of any project built since the passage of Proposition 13, and, technically are not fiscal impacts since they do not affect public treasuries.

The fiscal consultants agree that these impacts are not strictly fiscal impacts, but add that their approach has been to analyze the full cost burden of public facilities financing costs. They argue that the impacts on developers, builders and future residents may reflect some of the realities of the effects of Proposition 13, they are nevertheless the product of the specific financing plan proposed by the sponsors for Las Positas.

- i. The comment is made that the financial analysis in the RDEIR fails to recognize the linkage between occupancy of Las Positas and the construction of new capital facilities. If market conditions or other factors were to inhibit the rate of occupancy and development, then the rate of capital improvements construction would also be inhibited because the new facilities would not be needed.

The consultants respond that the annual capital improvement fund deficits shown in their analysis illustrate that there is not a strict, one-to-one linkage between needed capital facilities and occupancy of residences. The installation of many capital facilities cannot be divided into five or ten year increments; rather, it will often be the case that the entire facility must be constructed before all of its total users have occupied houses or businesses. In the proposed financing plan, certain capital facilities would need to be constructed and funded before there is a sufficient revenue base to cover these costs. They therefore emphasize that the financing for all infrastructure for each phase of development must be in place before the phase is authorized.

- j. Several commenters question assumptions used in the RDEIR financial analysis of health and social service costs for Las Positas residents. A number feel that because residents of Las Positas would have sufficient incomes to afford private medical care, their impacts on County health care services would be minimal. Others contend that the impacts would be greater than stated in the RDEIR, either because the project as proposed, would provide a substantial amount of housing for low and moderate income households, or because, as the population of the project ages, its demands for County health (and social) services will increase.

The fiscal analysis assumes that Las Positas residents would require half the per capita County-wide level of health



service. We agree that opinions will vary as to what percent of County-wide health costs should be used. The fiscal consultants recommend that fifty percent represents a fair estimate.

- k. The comment is made that while Table 5.43 in the RDEIR indicates that projected cash flow deficits in the Public Land Acquisition and Capital Improvement funds would require revenue from other public agencies, in fact, there are no deficits projected in the Land Acquisition Fund, and deficits in the capital improvement fund are limited to one year's duration (Gruen Gruen & Associates).

The fiscal consultants advise that the subject table should be corrected to indicate that the Public Land Acquisition fund would have annual deficits, but not cumulative deficits, and would therefore not require assistance from other agencies. The Capital Improvement Fund would, however, have both annual and cumulative deficits, and would require revenue from other public agencies or other sources. The consultants do not anticipate any financing from other public revenues; they propose use of a development agreement, or similar device, for each phase to provide adequately for required sources of financing.

1. The Livermore Area Recreation and Park District (letter of May 13, 1983) disagrees with total revenue projections shown for it in the RDEIR. They note that while it does collect user fees for program purposes, these monies are used to offset some of the costs for program activities but are not, as was stated in the RDEIR, used for park maintenance purposes. They also advise that LARPD only receives about 90 percent of its share of property tax revenues, rather than 100 percent assumed in the RDEIR.

This comment is noted. Table 5.57 has been revised to delete user fees from revenues available to finance park maintenance, and to reduce property tax revenues by 10 percent.

- m. The Park District indicates that the analysis addressed park grounds maintenance costs only, but did not consider costs for operation and maintenance of facilities and public buildings, personnel staffing, administration, and equipment needs and supplies.

This is correct. Table 5.57 has been footnoted to note this. These additional costs were not available in time to include

in this EIR.

- n. The Metropolitan Transportation Commission (May 13, 1983) notes that while the financing plan in the DEIR proposes means for financing a number of off-site roadway improvements, a substantial part of the financing will depend on sources outside the project, and the availability of such financing is highly uncertain.

This is true, and points to the need for a comprehensive, Valleywide transportation study and plan.

- o. Clarification regarding repayment of the sponsor's advance is requested (Roland Manye, LAFC, letter of May 11, 1983).

In the RDEIR it was stated that it was assumed that market rate interest would be paid on the advance. The fiscal consultants advise that this should be revised to read "for the analysis, it was assumed that interest would be paid at a rate of interest not to exceed the rate of general price inflation" so that the payback would be equivalent to the Sponsor's advance in constant dollars.

- p. The City of Livermore (letter of May 16, 1983) argues that the fiscal analysis is predicted upon unverified capital cost estimates made primarily by the developer. CEQA requires that this information, provided by the proponent and included in the EIR, be subjected to full and independent scrutiny.

The capital cost estimates for the proposed Las Positas CSA were developed by Wilsey & Ham and Lowry & Associates, acting in their capacity as professional engineers. Some capital cost estimates were provided by public agencies which would be providing services. Further, the review period for the Draft and Revised Draft EIR for this project has provided ample time for critical scrutiny of these cost estimates by all interested parties.

- q. Additional information on the full costs imposed by Las Positas on the City of Livermore are requested (City of Livermore, May 16, 1983).

Additional information is provided in this EIR to show revised cost impacts for the City Library. (See Table 5.59- Revised, with the response to P.15.2) Revised project impacts on City roadways (capital costs) are included in the revised

Transportation Analysis. The Livermore Police Department may receive emergency first response from Las Positas residents, as well as backup response requests. However, the County Sheriff's Department would, in exchange, provide backup to Livermore from its patrols in Las Positas.

- r. The question is raised as to what would happen, and who would be responsible for the project if it failed. This contingency is currently discussed in Section 5.8 of the RDEIR. A performance bond, or alternatively, a development agreement, could be used by the County to ensure that County taxpayers as well as Las Positas citizens are not held accountable for the default by any developer.

## P. Land Uses

### 1. Summary of Findings in the DEIR

The project would result in irreversible changes in land uses, from existing agricultural and rural residential uses, to urban uses. These effects are unavoidable. During project buildout, conflicts could arise between planned urban uses and remaining agricultural uses within the project area. This would be partially mitigated through controls on project phasing, and through improvements in police protection services in the general area. Some "leap-frog" development is possible, due to the number of ownerships in the project area. The potential for this would probably best be mitigated through formal agreements among all ownerships to ensure orderly rates of development. Impacts of urban activities and uses on adjoining agricultural uses could occur. Again, these could be mitigated through improvements in police protection services, but also through design measures to buffer these open space areas from the community. The action of the County to approve the current project, to be served by a CSA governed by the County Board of Supervisors could establish a precedent for other unincorporated lands in the County. This effect is only partially mitigable.

A number of elements and features of the project sponsor's proposed land use diagram are problematic, and could make implementation of the proposed development difficult. These would best be resolved through adjustments in the diagram.

### 2. Summary of Comments and Staff Responses

- a. A number of comments concerned potential interim impacts on



existing agricultural and residential uses (Residents of Bel Roma and May School Roads). These impacts are currently described in the RDEIR, and are only partially mitigable. (See Summary Item X.X for a discussion of assessment districts)

- b. The Federal Communications Commission has submitted substantial additional information relating to potential impacts of urban development on the operations of their existing Monitoring Station in the project area. Based on our understanding of these materials, we conclude that very substantial changes to the overall development concept for Las Positas would be required to avoid or minimize potential impacts on the Station. If these changes were not made, we conclude that the Station would need to be relocated. In this case, a solution should be negotiated at the outset of the project to secure an alternate site acceptable to FCC and to assure that relocation can be accomplished without cost to the public or to the Federal government.

I. AGENCIES, ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED IN WRITING ON  
THE LAS POSITAS DRAFT ENVIRONMENTAL IMPACT REPORT

I.A. Agencies, Organizations and Individuals Who Commented in Writing on  
the June, 1982 Draft Environmental Impact Report

Written comments on the June 18, 1983 Las Positas DEIR were  
received from the following:

- . John B. Chestnut, Jr.
- . W. Douglas Hamilton, Horticulture Advisor, Cooperative  
Extension in Alameda County, University of California
- . Residents of Bel Roma Road
- . Richard L. Greene, Bronson, Bronson & McKinnon
- . Roy L. Towers, Las Positas Land Company
- . John C. Spencer, Wilsey & Ham
- . Dale Turner, Mayor, City of Livermore
- . Mas Yonemura, Yonemura and Yasaki
- . M. Carotenuto, District Marketing Supervisor, Pacific Gas  
and Electric Company
- . Mr. and Mrs. Manuel F. Silva
- . Lona McCallister
- . Gene A. Broadman, Patricia A. Broadman
- . Frances A. Speekman
- . Howard L. Goode, Department Manager, Planning and Analysis,  
Bay Area Rapid Transit District
- . Theodore K. Taylor, Loral A. Taylor
- . Gerald A. Smith, Werk/Smith and Associates
- . Thornton K. Taylor
- . Paula Carrell, Conservation Rep., San Francisco Bay Chapter  
Sierra Club
- . Morry Langer
- . Gale Wetterstrom
- . William Ward, Executive Secretary, Building and Construction  
Trades Council of Alameda County
- . George A. Hess, Business Manager and Financial Secretary  
Treasurer, Plumbers and Gas Fitters Local Union No. 444
- . Jack Smith, Las Positas Land Company
- . A.R. Garaventa
- . Linda Best, Executive Secretary, Coalition of Labor and  
Business
- . J. Michael Walford, Public Works Director, Contra Costa  
County Public Works Agency
- . Mary Ann Jannon, President, League of Women Voters of the  
Livermore-Amador Valley
- . Lynne Stein, President, Board of Education, Livermore Valley  
Unified School District

- . Albin R. Jensen
- . Roy E. Coverdale, General Manager, Alameda County Water District
- . Rosemarie Gleese
- . John B. Quigley
- . Minna J. Thompson
- . Juanita L. Hawley
- . Mike Sample, Chief, Livermore Fire Department
- . Lee Horner, City Manager, City of Livermore
- . Lois Ellsaesser, Chairperson, Board of Directors, Livermore Area Recreation and Park District
- . Leland J. Bruzzzone, Attorney for Rosemarie Gleese
- . Knox Dunaway, General Partner, Central Livermore Association
- . Edwin E. Hendrickson
- . Edward A. Danehy, Engineering Geologist, County of Alameda
- . Mun J. Mar, General Manager, Alameda County Flood Control and Water Conservation District, Zone 7
- . Lee E. Ham, Chairman of the Board, Wilsey and Ham
- . Leland Richard Stanley
- . Leland E. Stanley
- . John Holtzclaw, Chair, Conservation Committee, San Francisco Bay Chapter Sierra Club
- . Randolph Stone
- . Agnes Quigley
- . T.H. Lindenmeyer, Environmental Coordinator, East Bay Regional Park District
- . Douglas G. Detline, Principal Administrative Officer, Association of Bay Area Governments
- . Mel Hing, County Administrator
- . Ann Barkley, Chief, Department of Transportation, Division of Transportation Planning
- . E.C. Fullerton, Department of Fish and Game
- . Steve R. Ritchie, San Francisco Bay Regional Water Quality Control Board
- . Richard P. Wilcoxon, Assistant Deputy Director, Environmental Health Division, State Department of Health Services
- . Harvey F. Collins, PH.D., Deputy Director, Environmental Health Division, Department of Health Services
- . Milton Feldstein, Air Pollution Control Officer, Bay Area Air Quality Management District
- . Ronald G. Sorensen, Chief, Road Division, Alameda County Public Works Agency
- . Larry Ornman, Executive Director, People for Open Space
- . Gerald S. Kzakowic, Chairman, Zone 7 Board of Directors
- . Robeart R. Mooney, Chief, Project Evaluation Section, Technical Support Branch, Department of the Army, Corps of Engineers



- . Thomas N. Van Stavern, Engineer in Charge, Federal Communications Commission Field Operations Bureau
- . Roland Mayne, Executive Officer, Local Agency Formation Commission
- . Commissioner Shirley Douglas, Alameda County Planning Commission
- . Darnall Reynolds, District CEQA Coordinator, Department of Transportation
- . Robert R. Mooney, Chief, Project Evaluation Section, Department of the Army, Corps of Engineers
- . Anna Polvos, State Clearinghouse
- . Supervisor Fred F. Cooper, Alameda County Board of Supervisors
- . Richard S. Gunther
- . Dr. and Mrs. Robert Webb
- . Chester R. MacPhee
- . Richard Edminster, Alameda County Solid Waste Management Authority
- . Richard Edminster, Airport Land Use Commission

I.B.      Agencies, Organizations and Individuals Who Commented in Writing  
on the March, 1983, Revised Draft Environmental Impact Report

Written comments on the March 1983 Revised Draft Environmental Impact Report, and which require responses, were received from the following. These are listed by EIR subject area and are numbered to correspond with the organization of the Staff Responses to Written Comments on the Revised Draft Environmental Impact Report (X, below)

A. Project Description

- A.1.0. Van Norden Logan, Vice President, Duffel Financial and Construction Company
- A.2.0. C. Don Brothers, Edna E. Roberts
- A.3.0. Wilsey and Ham
- A.4.0. Riho Martinson, for Orr Property Venture
- A.5.0. Residents of Bel Roma Road

B. Atmospheric Conditions

- B.1.0. Bay Area Air Quality Management Distraict
- B.2.0. City of Livermore
- B.3.0. Association of Bay Area Governments

C. Biotic Conditions

- C.1.0. Department of the Army, San Francisco District, Corps of Engineers
- C.2.0. East Bay Regional Park District
- C.3.0. Department of Fish and Game

D. Housing and Employment

- D.1.0. Supervisor Fred Cooper
- D.2.0. Wilsey and Ham
- D.3.0. City of Livermore
- D.4.0. ABAG
- D.5.0. Coalition of Labor and Business

E. Public Plans and Policies

- County of Alameda General Plan Policies
- E.1.0. City of Livermore  
ABAG Policies
- E.2.0. City of Livermore
- E.3.0. ABAG  
LAFCO Policies
- E.4.0. City of Livermore  
Williamson Act
- E.5.0. City of Livermore

F. Recreation

F.1.0. Livermore Area Recreation and Park District

G. Police Protection

G.1.0. Sheriff's Department, County of Alameda

H. Schools

H.1.0. Livermore Valley Joint Unified School District

H.2.0. Livermore Committee for Quality Education

I. Water Supply/ Hydrologic Conditions

I.1.0. East Bay Regional Park District

I.2.0. Alameda County Flood Control and Water Conservation  
District, Zone 7

I.3.0. City of Livermore

J. Wastewater and Groundwater Management/ Hydrologic Conditions

J.1.0. Livermore-Amador Valley Conservation Group of the Bay Area  
Sierra Club

J.2.0. San Francisco Bay Regional Water Quality Control Board

J.3.0. John Stein, Councilmember, City of Livermore

J.4.0. East Bay Regional Park District

J.5.0. ACFCWCD, Zone 7

J.6.0. Alameda County Water District

J.7.0. Wilsey and Ham

J.8.0. City of Livermore

J.9.0. County of Alameda Public Works Agency

J.10.0. ABAG

K. Flood Control/ Hydrologic Conditions

K.1.0. Department of the Army, SF District, Corps of Engineers

K.2.0. Department of Fish and Game

K.3.0. ACFCWCD, Zone 7

K.4.0. Department of Transportation-04, Environmental Analysis  
Branch

L. Solid Waste

L.1.0. Richard Edminster, Alameda County Solid Waste Management  
Authority

M. Transportation: Streets and Highways

M.1.0. Department of Transportation-04 (comments on June 1982  
DEIR)

M.2.0. Department of Transportation-04

M.3.0. City of Livermore

M.4.0. Bay Area Air Quality Management District

M.5.0. County of Alameda Public Works Agency



N. Air Transportation

N.1.0. Richard Edminster, Alameda County Airport Land Use  
Commission

O. CSA and Alternatives

- O.1.0. City of Livermore, statement by Mayor Dale Turner
- O.2.0. Roland Mayne, Executive Officer, Local Agency Formation  
Commission
- O.3.0. City of Livermore
- O.4.0. Alameda County Public Works Agency
- O.5.0. ABAG
- O.6.0. Residents of Bel Roma Road

P. Fiscal

- P.1.0. Board of Education, Livermore Valley Unified School  
District
- P.2.0. Supervisor Fred Cooper
- P.3.0. Bart Schenone, Haley, Schenone, Birchfield and Smith
- P.4.0. Livermore Committee for Quality Education
- P.5.0. Gail Vardanega
- P.6.0. Alameda County Library System
- P.7.0. John Stein, Councilmember, City of Livermore
- P.8.0. Riho H. Martinson, for Orr Property Ventures
- P.9.0. Leland E. Stanley, Mary Elise Stanley
- P.10.0. Gruen Gruen & Associates
- P.11.0. Federal Communications Commission Field Operations Bureau,  
San Francisco Region
- P.12.0. Livermore Area Recreation and Park District
- P.13.0. Metropolitan Transportation Commission
- P.14.0. Roland Mayne, Executive Officer, Local Agency Formation  
Commission
- P.15.0. City of Livermore
- P.16.0. Hiro Fujimoto, Chief Deputy Auditor, Alameda County Office  
of the Auditor-Controller
- P.17.0. Residents of Bel Roma Road
- P.18.0. Mel Hing, County Administrator

Q. Federal Communications Commission Monitoring Station

Q.1.0. FCC Field Operations Bureau, San Francisco Region

R. Acoustical Conditions

R.1.0. Environmental Health Division, Department of Health  
Services

Written comments on the Revised DEIR were also received from the following. These are acknowledged. No further response is required.

- . Mary Ann Hannon, League of Women Voters
- . John Alan Fagundes
- . Francis A. Speekman
- . John V. Fashing, East Bay Municipal Utilities District
- . Valerie Raymond
- . Thornton K. Taylor
- . Chester R. MacPhee, Masonic Homes
- . Bay Area Rapid Transit District





II. PLANNING DEPARTMENT STAFF RESPONSES TO WRITTEN COMMENTS RECEIVED ON  
THE DRAFT ENVIRONMENTAL IMPACT REPORT

II.A. Responses to Written Comments on the June, 1982 Draft Environmental  
Impact Report

Responses to Written Comments on the June 18, 1982 Draft  
Environmental Impact Report were included as Appendix A to the  
March 1983 Revised DEIR. The subject Appendix is a part of the  
current Final Environmental Impact Report.

II.B. Responses to Written Comments on the March, 1983 Revised Draft  
Environmental Impact Report

Staff responses to written comments on the March 1983 Revised  
Draft EIR are herein organized by subject area, as follows:

- A. Project Description
- B. Atmospheric Conditions
- C. Biologic Conditions
- D. Housing and Employment
- E. Public Plans and Policies
- F. Recreation
- G. Police Protection
- H. Schools
- I. Water Supply/ Hydrologic Conditions
- J. Wastewater and Groundwater Management/ Hydrologic Conditions
- K. Flood Control/ Hydrologic Conditions
- L. Solid Waste Management
- M. Transportation
- N. Air Transportation
- O. CSA and Alternatives
- P. Fiscal
- Q. FCC
- R. Acoustical Conditions



A. Project Description

A.1.0 Van Norden Logan, Vice President, Duffel Financial and Construction Company, letters of April 13, 1983 and December 10, 1983

A.1.1 "We are owners of . . . (the parcel) . . . designated as Parcel X-44 . . . We are in favor of the proposed incorporation, but opposed to the projected land use of our property . . . The appropriate use for our land should be 20 units per acre between the two ring roads and 15 units per acre for the remainder of the land . . . "

Response: The comment pertains to the proposed land use diagram and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

A.2.0 C. Don Brothers, Edna E. Roberts, letter of April 26, 1983

A.2.1 We are concerned because of the following circumstances: #1. Las Positas Land Company does not include our property in their plan; #2. Your alternate plan shows our parcel as open space. Our parcel is shown in Assessor's Book 99, Page 25, containing 55 acres. We would like to be zoned other than Open Space - possibly 2 or 3 units to the acre. However, if you continue to designate our property Open Space there should be a guarantee we are paid a fair price first."

Response: The comment pertains to the proposed land use diagram and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations. It is here noted that no change in general plan land use designations are currently under consideration for the subject parcel insofar as it is not included, nor have the owners requested the County to include it in the Las Positas area of General Plan amendment and rezoning consideration.

A.3.0 Wilsey and Ham, letter of May 13, 1983

A.3.1 "It is requested that the following changes be made to the Plan Diagram, Figure 2.1. 1) The Rod and Gun Club property be excluded . . . ; 2) Assessor's Parcel No. 99B-4500-4 be included . . . and be given a designation of residential at 2 du/acre. 3) The westerly portion of parcel 99B-4200-1 be included . . . and be



designated as a contingency disposal area . . . 4) The . . . properties along or near Bel Roma Road be designated residential at 20 du/acres . . . "

Response: The comment pertains to the proposed land use diagram and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

- A.3.2 "Please include in the land area identified for irrigation the 135 acres shown on Figure 2.6 as a contingency disposal area. In addition, note that additional areas outside the proposed project development area could also be used for irrigation purposes; portions of parcel 99B-4500-4 and 99B-4200-4-8 as shown on Figure 5.17. Furthermore, the typical storage ponds, as shown on Figure 2.7 could also be used for irrigation during the dry seasons as the ponds would only be filled during the wet season when irrigation would not be possible."

Response: The comment is acknowledged. Staff responses to this and other similar comments on the land use diagram are included in the final staff report on the Plan amendment and rezoning considerations. The comment regarding use of storage ponds for dry season irrigation is acknowledged.

- A.3.3 Appendix B, page 87. All of parcel 99B-4500-4 should be included in the Las Positas General Plan Amendment. The designation for this parcel should be 2 du/a . . . "

Response: The comment pertains to the proposed land use diagram and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

- A.4.0. Riho H. Martinson for Orr Property Venture, letter of May 11, 1983

- A.4.1 "The Alternative Land Use Diagram shown in Figure 5.18 is preferred by us, and we recommend that the Commission consider a modification of this proposal . . . We request that the designated industrial land area on our parcel be reduced substantially and that the LR2 area be enlarged. An industrial parcel of the size shown immediately to the north of our property is ample for the project and would improve the alternative land use plan in that the proposed middle school would not then abut on an industrial area on two sides."

"We also request that a proposed phasing plan be prepared for the alternative land use plan . . . "

Response: The comment pertains to the proposed land use diagram and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

A.5.0      Residents of Bel Roma Road, letter of May 14, 1983

A.5.1      "Since we have developed our land and have investments here, we must be zoned to the highest density in our phase . . . We are in favor of higher density for Bel Roma-May School (18.9) and lower density (11.8) around us as shown in the alternative density plan. We are totally opposed to the density ratings as put forth by Las Positas Land in its original proposal. Therefore we insist that the alternative density plan be adopted if this project is to be accepted."

Response: The comment pertains to the proposed land use diagram and proposed phasing and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

A.5.2      "We further stipulate that phases must be completed in order and totally."

Response: The comment pertains to the proposed project phasing and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

A.5.3      "It is also imperative that when and if this plan reaches the phase in which we are included that our lands be first in line for development."

Response: The comment pertains to the proposed phasing plan and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

A.5.4      "Another condition of acceptance is that Bel Roma Road not become a thoroughfare until such time as the last parcel is developed on this road."

Response: The comment pertains to the proposed land use and circulation diagram and phasing plan and is acknowledged. Staff responses to this and other similar comments are included in the final staff report on the Plan amendment and rezoning considerations.

- A.5.5 " . . . we are opposed to mandatory hookup to any sewer, water, or other lines made available at any time prior to development of our properties."

Response: The comment is acknowledged. Staff responses to comments on service provisions for the proposed development are included in the final staff report.

- A.5.6 . . . before this plan is approved it must be mandatory that Las Positas Land Company own or have secured options on every parcel in order to allow for a consistent development program."

Response: This is currently not proposed by the Las Positas Land Company nor is it envisioned by Planning Department staff that full ownership or control of the entire Las Positas project area by the current sponsors or other single entity would be essential to the project's implementation. This does not preclude the potential need for adequate measures in the project Financing and Development Plans and Agreements to ensure equitable treatment of all property owners; nor does this preclude the potential need for a formal agreement by all area property owners to the provisions and conditions of the General Plan amendment, rezoning, financing plan, etc., in order to ensure the project's implementation consistent with all basic objectives set for it and with all requirements to mitigate potential adverse environmental impacts



B. Atmospheric Conditions

B.1.0 Bay Area Air Quality Management District, letter of May 16, 1983

B.1.1 " . . . the strategy of phasing is also critical, lest the new housing be occupied by long-distance commuters before there is enough employment available for residents. If the numbers, appropriateness or phasing are not right, the development of Las Positas could well lead to an exacerbation of the commuting problem, with further air quality degradation."

Response: The comment is acknowledged. Staff concludes that this situation could possibly occur towards the end of project buildout (i.e. Phase 4) when housing needs of new Las Positas workers would exceed the proposed new housing supply in Las Positas. However, the relationship between Phase 4 housing needs and housing supplies improves when housing turnover is included. Staff does not conclude that any significant portion of the housing units in Las Positas would be occupied by "long-distance commuters", as suggested. It can reasonably be assumed that most employed Las Positas residents not working within the community would commute to employment centers within the Livermore-Amador and San Ramon Valleys, which centers are within a 10 to 30 minute commuting distance from the Las Positas project area.

Staff does agree that achievement of proposed amounts of commercial and industrial development within Las Positas may be of greater concern, in terms of potential traffic and air quality impacts, than the phasing of residential and commercial/industrial development. The potential impacts of a project with reduced amounts of commercial/industrial development are evaluated in Section 7.0 of the RDEIR as Project Alternative 7.4.

B.1.2 "The Revised DEIR still states that NO<sub>x</sub>, for space heating will be the principal stationary source pollutant . . . though, in a footnote . . . it is admitted that industrial development could produce organic emissions. If the figures are compared, these organic emissions would far exceed the cited NO<sub>x</sub> levels."

Response: Noted.

B.1.3 " . . . the analysis of carbon monoxide requires the most correction . . . (a) background levels of CO should be integrated into tables . . . not merely mentioned in text and footnotes. (b) In addition, the background CO level, within up to a mile of I-580 is estimated by CalTrans to be 3 to 4 ppm for an 8 hour average, rather than the 0.5 ppm mentioned in the revised DEIR.

(c) We do not dispute that the hills of 200 feet would limit upslope motions and the CO transport from the freeway - during stable conditions. However we suggest that meteorological conditions for a CO episode consist typically of one to two weeks of very stable winter time conditions . . . How deep would the surface-based polluted layer become along I-580 in these situations? What channels exist in the hills for incursions of this polluted layer what might be its contributions to CO background? Does consideration of these points add to the number and location of exceedances of CO standards in the tables - both inside the project area and its vicinity? The most accurate method for producing a valid existing background value would be to perform CO monitoring in various locations under the cited worst-case winter time conditions."

Response: (a) Table 4.2 is modified, as follows, to include background concentrations, and also to reflect the revised traffic volumes using the UTPS model (See responses to Caltrans comments M.1.0 and M.2.1. See also the revisions to the transportation analysis which are included as an Appendix to this FEIR).

Based on the revised projections of traffic volumes, it would be necessary to widen and improve North Livermore Avenue, as indicated, in order for CO air quality standards to be maintained along that corridor. The concentrations shown in the revised Table assume that North Livermore Avenue would be improved to a four lane arterial by 1995, and to a 6 lane arterial by 2000. By year 2005 two additional lanes would be needed . In the revised traffic analysis it is proposed that these be provided as a new, two lane connector road extending between Las Positas Road and Hartford Avenue, with ramps for freeway access (see Table 5.37, p.5-143 of the Revised DEIR. See also the revised transportation analysis, included as an Appendix to this FEIR). This proposal is reflected in Revised Table 4.2, above. The air quality consultants note that approximately the same CO concentrations would result along the North Livermore Avenue corridor if the additional lanes were added to that facility, expanding North Livermore Avenue to a total of eight lanes.

Assuming the arterial improvement schedule outlined above, CO concentrations along North Livermore Avenue, and adjacent to the proposed Town Center, are estimated to remain in compliance with the eight hour carbon monoxide standard.

(b) Tables 4.3a and 4.3b (Revised DEIR, pp. 4-9, 4-10) are also revised, and have been combined to include background concentrations and to reflect revisions to the traffic analysis.

Table 4.2 - Revised  
 Predicted Carbon Monoxide Concentrations  
 Within the Las Positas Project Area  
 (ppm)

North Livermore Avenue  
 North of I-580

Year	Peak Hour	Max. 8 Hour	Background	Total	Comment/Mitigating Measure*
1990	1.4	1.0	3.5	4.5	2 lanes
1995	2.9	2.0	3.0	5.0	4 lanes
2000	4.3	3.0	2.5	5.5	6 lanes
2005 (without TSM)	5.7	4.0	2.0	6.0	6 lanes plus new 2 lane arterial

North Livermore Avenue  
 Adjacent to Las Positas Town Center

Year	Peak Hour Adjacent Street	Area Contribution	Total	Maximum 8 Hour	Background	Total
1990	0.7	0.6	1.3	0.9	0.5	1.4
1995	1.2	1.1	2.3	1.6	1.0	2.6
2000	1.7	1.7	3.4	2.4	1.5	3.9
2005 (without TSM)	2.7	2.4	5.1	3.6	2.0	5.6

\* With facility improvements as indicated. Without TSM. See the preceding text for further discussion.

Source: Wilsey & Ham, November 17, 1983  
 Table assembled by Alameda County Planning Department



Table 4.3a,b - Revised

Predicted Eight Hour Carbon Monoxide Concentrations  
 Outside the Las Positas Project Area: 2005<sup>1</sup>

Location	(ppm)	
	Without Las Positas <sup>2</sup>	With Las Positas <sup>3</sup> (Without TSM)
I-580: Airway Boulevard to El Charro Road	4.1	4.7
Route 84: I-580 to Portola	3.0	3.6
Collier Canyon Road: I-580 to "New Collier Canyon Road"	2.2	2.3

<sup>1</sup> Includes 2 ppm background concentration.

<sup>2</sup> With roadway network designed to accomodate trips in 2005 without Las Positas trips at LOS D or better. ("without" network)

<sup>3</sup> Without additional systemwide improvements required to accomodate additional traffic from Las Positas to maintain LOS D. With these additional improvements the CO concentrations at the locations analyzed would not change significantly.

Source: Wilsey & Ham

Table assembled by Alameda County Planning Department

With the revised traffic volumes, and including a 2 ppm background concentration, the predicted concentrations do not exceed the standards. Current background levels are estimated at between 2 to 4 ppm by Caltrans. By 2005 the reductions in emissions for vehicles should reduce the background concentration to about 2 ppm, as indicated above.

(c) As indicated in the Revised DEIR, the predicted concentrations are "worst case" levels that can be anticipated, i.e., stagnant air conditions building up over a period of several days. Under normal conditions the mixing height in the surface layer in the Bay area during the winter is 400 meters (6 MPH wind speed) in the morning rising to 800 meters (8 MPH wind speed) in the afternoon. There is a likelihood one episode per year ("worst case" conditions)

exceeding five days where the average mixing heights are less than 500 meters and the wind speeds are less than 8 MPH. Any episode will be generally wide and will be the cause of the 2 to 4 ppm background level that contributes to the concentrations at specific locations. (Reference: Holzworth, G.C., Mixing Heights, Wind Speeds and Potential for Urban Pollution Throughout the Contiguous United States, Environmental Protection Agency, Research Triangle Park, N.C., 1972).

To more adequately respond to the comment on meteorological conditions, depth of the surface polluted layer and routes for incursion, a much more detailed analysis would be required. It would be necessary to collect extensive meteorological data using a multi-level tower. Data would need to be collected for several months during the winter and spring in the hope than an episode of sufficient duration would occur to realistically assess "worst case" conditions. The time, effort and cost required to collect this data is beyond the scope of this analysis. Based on general knowledge of meteorology, topography and current emission levels in the Livermore Valley, the carbon monoxide standards are not predicted to be exceeded, as shown above, upon completion of Las Positas in 2005, if the appropriate mitigating measures described in the revised Traffic Analysis are implemented.

- B.1.4 (a) "We believe that the calculation which includes a 25% reduction in . . . traffic volumes due to (TSM) . . . is still very optimistic . . . (b) A candid display of the mitigation impact of TSMs on air quality would be one that separates out those committed to, or at least realistically achievable . . . (b) Also useful would be modeling of the traffic and resultant CO impacts of a smaller proportion of internal- as compared to external- traffic."

Response: (a) The current comment by the District, and by others, is not inconsistent with findings of the Revised DEIR. There it is stated that a 25 percent reduction could be regarded as a maximum and that actual levels of effectiveness would fall between this and levels indicated without any TSM (RDEIR, p.5-136).

(b) The transportation consultants were asked to provide a fuller discussion of available TSM measures, as well as a conservative or "worst case" estimate to illustrate how realistically achievable TSM measures might work. Three areas were reviewed: ridesharing strategies; increased transit use; and variable work hours. The reduction of peak-hour vehicle work trips through the application of these total 25 percent; approximately 55 percent of the peak-hour volumes are work trips, resulting in a net reduction of about 14 percent. For further discussion of these, refer to the response to Comment M.4.0.

B.2.0      Comments by the City of Livermore on the Revised Draft Environment Impact Report . . . received May 16, 1983.

B.2.1      (a) " . . . the DEIR includes no air quality impacts in its list of unavoidable adverse impacts. Yet, elsewhere the DEIR notes that the project "would result in significant increases in emissions due to increases in traffic levels in the basin . . . A review of the proposed air quality mitigation measures scattered in different sections . . . indicates that these impacts cannot and will not be totally mitigated . . . (b) It is impossible to determine the extent to which the air quality impacts could or would be mitigated because, other than Transportation System Management measures, the discussion of mitigation measures omits this critical information."

Response: (a) We concur that emissions from the Las Positas project, due primarily to increases in amounts of auto travel, would constitute a significant addition to that otherwise projected for the Livermore-Amador Valley basin. This would constitute an adverse impact on air quality which could not be fully mitigated by measures under the control of the County (e.g., through land use regulations, and requirements for transportation facilities improvements and for system management). We conclude that these impacts would be unavoidable without the implementation of more stringent emission controls, which would require changes in current state and federal legislation.

(b) It is not expected that stationary source emissions would be significant because of the nature of the proposed uses, and because of strict stationary source controls. Any stationary source of potential significant emissions would be regulated by the BAAQMD to minimize and/or offset these.

B.2.2      (a) "This DEIR has repeated several mistaken assumptions made in the first EIR, which leads to a significant underestimate of impacts on air quality and transportation systems . . . (e.g.) the assumption that 60% of peak hour and 65% of average daily traffic will be internal to the project is not substantiated . . . (b) (and) no information concerning salaries of Las Positas employees is given and correlated with housing prices . . . to substantiate the DEIR's assertion that (80%) . . . of Las Positas employees will live within the project. . . (c) Furthermore . . . the . . . (TSM) program is assumed to reduce traffic effects by up to 25%. . . Since there is no demonstration of firm commitments to all aspects of the TSM program, the DEIR should analyze impacts that would result if a portion or none of the program were implemented . . . Use of the



worst case assumptions regarding TSM and . . . internal traffic is particularly important . . . "

Response: (a) In the Draft EIR and Revised Draft EIR, the transportation analysis was based primarily on an extrapolation of trends and research conducted for similar large-scale projects. This comment by the City of Livermore, and by others, on the draft document indicated that a more detailed and refined transportation analysis was needed. As a result, a revised Transportation Analysis was prepared, and is included as an Appendix to this FEIR. The revised Analysis bases the traffic impacts and resultant mitigating measures on the results of application of a UTPS computer model which forecasts and assigns anticipated traffic generated by the project, as well as other approved and anticipated developments in the area.

In revisions to the transportation analysis one of the key findings was the percentage of Las Positas traffic which would remain on-site; approximately 29 percent would be internal, and 71 percent external to the project area. This was developed directly from the trip tables of production and attraction trip-ends from zones in the Las Positas area.

(b) Only general information on types of project area employment can be developed at this time. This type of information, however, was not essential to the traffic modeling undertaken in the revised Transportation Analysis.

(c) Three types of mitigating measures have been identified to alleviate the negative traffic impacts of the Las Positas project; they are a valley-wide transportation planning study, a transportation system management (TSM) program, and physical improvements to freeways, arterials, and intersections to increase their capacity. In the revised Transportation Analysis, only the last of these (facilities improvements) is quantified in terms of minimizing impacts. This would be equivalent to a "worst case" scenario as far as assumptions of TSM effects are concerned. However, it is emphasized here that all three measures would be needed in order to cope successfully with the future travel demands to be placed on it by Las Positas and other developments.

B.3.0 Association of Bay Area Governments, letter of May 16, 1983.

B.3.1 "Concerning efforts to reduce long distance commuting, the DEIR assumes that approximately 60 percent of the peak hour traffic and 65 percent of the daily volumes would remain entirely within the

development, based on the 1:1.1 jobs-to-workers per household ratio . . . this ratio is low, making the assumed percentages of internal commuting seem very high.

Response: In the revisions to the analysis, one of the key findings was that approximately 29 percent of Las Positas traffic would be internal, and 71 percent external to the project area. As noted in the response to the City of Livermore, above, this was developed directly from the trip tables of production and attraction trip-ends from zones in the Las Positas area. Regarding project jobs/housing relationships, refer to the responses to ABAG's Comments D.4.1 through D.4.4.

- B.3.2 "the proposed transportation systems improvement (TSM) measures are projected to reduce traffic volumes by 25 percent. This appears overly optimistic."

Response: Refer to the response to the City of Livermore's Comment B.2.2 (c), above.

- B.3.3 "Assumptions about the percentages of internal and external trips used in the traffic and air quality analyses should be revised downward consistent with revise job-to-household ratios. An additional carbon monoxide (CO) air quality analysis should be provided for traffic volume reductions on the order of 10 percent."

Response: Refer to the response to Comment B.2.2 (a), above. Refer also to the responses to Comments D.4.1 through D.4.4.

C. Biotic Conditions

C.1.0 Department of the Army, San Francisco District, Corps of Engineers,  
Robert R. Mooney, Chief, Project Evaluation Section, Technical  
Support Branch, letter of April 29, 1983.

C.1.1 "Any impacts on wetlands, threatened or endangered species, other valuable fish and wildlife resources, or on cultural resources are among the important environmental considerations for all Corps permit applications.

Response: Noted. No further response is required at this time.

C.2.0 East Bay Regional Park District, T.H. Lindenmeyer, Environmental  
Coordinator, Planning and Design, letter of May 9, 1983

C.2.1 "The discussion of wildlife . . . is very brief and contains at least one piece of misinformation. The San Joaquin kit fox does not inhabit heavy brushland. This rare mammal is a nocturnal hunter which uses eyesight and hearing to find its prey. It could not function in heavy brushland. It inhabits sandy washes and swales in the southern San Joaquin Valley. It ranges as far north as Contra Costa County in grazed rangeland along the western side of the San Joaquin Valley . . . Because of this misinformation, and because there apparently still has been no survey of the site for the Alameda striped racer snake, the Revised DEIR does not contain sufficient information. Decision makers cannot know whether the project would adversely affect rare or endangered wildlife. The mitigation discussion says that a wildlife survey should be conducted but admits that this would not constitute mitigation. Such a survey should have been conducted as part of the effort in preparing the FEIR. Without such a survey, both impacts on wildlife and mitigation measures remain unknown."

Response: A survey of the project area was conducted on July 6 and 7, 1983 by biologists of Environmental Science Associates, Inc., to examine the area for animal sign and suitable habitat for the San Joaquin kit fox and the Alameda striped racer. In addition to assessing the presence of the two species on the site, the biologists reviewed background literature on these animals and their occurrence in the nearby area and interviewed other researchers and resource specialists. The July 8, 1983 report by Environmental Science Associates is included as an appendix to this Final EIR. The findings of the report are summarized below:



San Joaquin kit fox

The San Joaquin kit fox presently ranges from southern San Joaquin Valley in unfarmed regions of western Kern County along the eastern side of the Diablo range to Contra Costa County. The eastern portions of San Benito, Monterey, San Luis Obispo Counties also contain kit fox. In contrast to statements in the Draft EIR, kit fox do not specifically inhabit brushlands. Historically their range covered the arid alkali sink and valley grassland plant communities of the San Joaquin Valley and eastern Diablo range. Conversion of these lands to agriculture has diminished the available habitat for the kit fox.

In Alameda and Contra Costa Counties kit fox inhabit rolling hills of annual grassland which may have scattered oaks. The kit fox have a relatively small home range size and rarely stray farther than three miles from their dens. Pups, which are born in early spring, remain with their parents until summer. In June or July, a family group usually disperses and new offspring may seek additional territory and a new home range. The need for range expansion is determined by the scarcity of prey in an area, the kit fox population, and the populations of other canid species (coyote, grey fox and red fox). A number of nearby unoccupied dens are needed by unmated adults and new family groups from established habitat areas.

In the Contra Costa and Alameda County areas, the kit fox prey upon ground squirrel, pocket mice, and desert cottontail. Although the kit fox may live adjacent to and hunt in agricultural lands, it normally will not use fields which are regularly disced or plowed. Such practices disrupt rodent populations and dens. A minimum of three years following discing is needed for reinvasion of the field by rodents and eventually kit fox.

A 1973 Fish and Game report outlines the range of the kit fox in Contra Costa, Alameda, San Joaquin and Tulare Counties. The report recorded no sightings on the Las Positas project site; however, kit fox occur both to the north and northeast in the Altamont Pass and Bethany Reservoir area and the proposed Los Vaqueros Reservoir site. Further studies have confirmed the presence of kit fox populations in these areas.

Certain parts of the Las Positas area offer habitat conditions similar to the Bethany Reservoir and Los Vaqueros areas. Canid dens occur in one area. Areas which exhibit potential habitat for

the kit fox were mapped (see Figure C.2.1.) based on several criteria: 1) the extent of rolling, grassland areas which may be grazed or mowed but not disced; 2) the proximity of the area to large areas of similar habitat which are contiguous to known habitat areas (e.g., Bethany Reservoir, Los Vaqueros area); and 3) the abundance of ground squirrel burrows which show evidence of canid use.

In one portion of the site adjacent to the Livermore Rod and Gun Club, burrows, prey remains and fox scat were found which resembled the kit fox dens examined near Bethany Reservoir. These burrows and sign found cannot be positively identified as that of kit fox although their features are similar enough to nearby areas to warrant further consideration. The absence of fox sign in other portions of the project area does not preclude their use by this species.

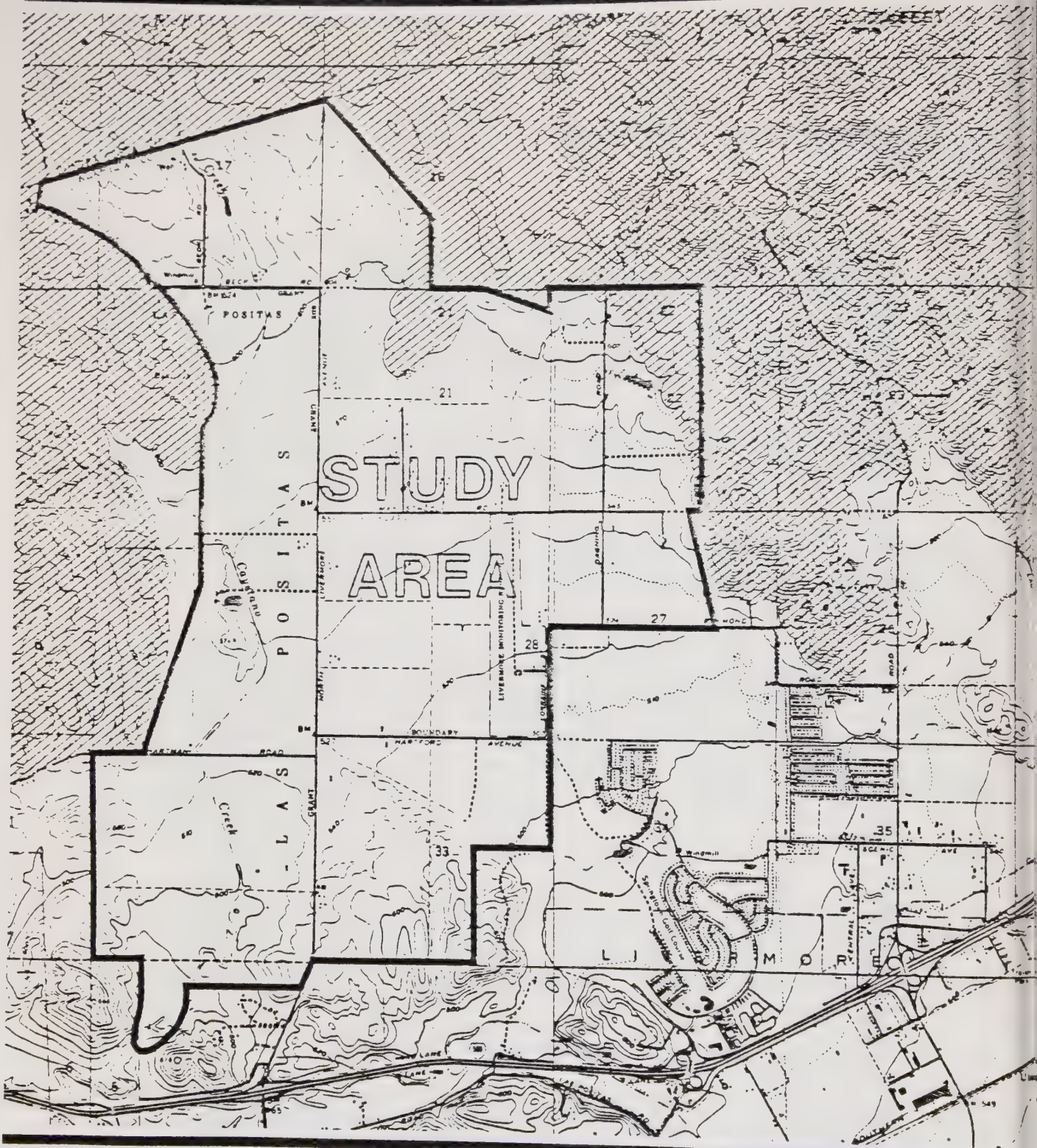
Based upon their findings, the biologists conclude that the kit fox could be feeding and using dens in portions of the Las Positas site and in other adjacent lands delineated. Flat agricultural lands in the Las Positas area could support rodent populations and kit fox could hunt these areas as well. In addition, should kit fox populations expand in the Altamont Pass and Los Vaqueros areas, suitable habitat lies to the south and west only. Therefore, the Las Positas area has the potential to be a feeding area for the existing kit fox population and a future expansion area for the fox.

The biologists further conclude that the Las Positas project would remove any kit fox habitat within the site from use by the species. The introduction of human activity and domestic dogs would disturb adjacent lands which the kit fox may presently use. The project would represent a block to western or southern expansion into Las Positas of the existing kit fox population in the Bethany Reservoir and Los Vaqueros areas.

Regarding the Alternative Land Use and Circulation Diagram, included in the RDEIR as Figure 5.18, the biologists note that the plan delineates some of the kit fox habitat as open space and other portions for residential uses. This alternative plan would remove approximately one third less potential habitat than the proposed Plan (Figure 2.1) but would also introduce disturbance from human activity and domestic dogs.

It is recommended that the potential kit fox habitat delineated by the biologists be zoned as open space. Should this action prove infeasible, the biologists recommend that California Department of





RANGE of KIT FOX (Refer to Response to Comment C.2.1 )

Figure C.



Fish and Game be consulted in order to design the final project plan to protect kit fox habitat to the greatest degree possible. The Department should also be consulted regarding the need for further verification of kit fox on specific areas of the project site.

#### Alameda Striped Racer

This species inhabits chaparral and may venture into rocks and grassland directly adjacent to chaparral vegetation. This habitat does not exist on the site and this species would not likely be found in the Las Positas project area.

C.3.0 Department of Fish and Game, Memorandum of May 9, 1983

C.3.1 "The kit fox inhabits grasslands such as those on the study area, not "heavy brushes stated on page 4-20."

Response: The comment is acknowledged. See the response to the East Bay Regional Park District (C.2.1, above) for further discussion.

C.3.2 "We are not convinced that peak stormwater runoff will not increase existing flooding and erosion problems on Arroyo Laguna and induce natural resource damaging flood control projects.

Response: Refer to the response to Comment K.2.1.

C.3.3 "The 'complete biological reconnaissance' recommendation . . . will be essential . . . The study should consider kit fox, vernal pools, riparian habitat, and sensitive plants. The study should designate natural resource preservation areas . . . Such a study should be made a condition for approval of this project and certification of this document."

Response: We agree. A detailed biological reconnaissance would need to be undertaken prior to any development in the project area; it is identified as a necessary part of project impact mitigation. The reconnaissance would serve as the basis for an area biological management plan, to be developed in coordination with concerned agencies and organizations.

C.3.4 "Operators will be required to submit notification of proposed channel modification pursuant to Fish and Game Code Section 1603."

Response: Noted. No further response is required at this time.

D.        Housing and Employment

D.1.0     Supervisor Fred F. Cooper, letter of May 10, 1983

D.1.1     "My impression has been that one of the justifications for Las Positas is to provide housing for people who will be holding these jobs as industry comes into the Valley. My impression is that the current EIR does not clearly indicate the need for housing in Las Positas for the workers in these proposed jobs. I would appreciate your letting me know whether my impression is correct or incorrect . . . ."

Response: These impressions are generally correct. A central argument of project proponents is that the proposed Las Positas development would be needed to make up for a potential "housing shortfall" resulting from housing demand associated with significant amounts of new jobs generating commercial and industrial development in the Livermore-Amador and San Ramon Valleys which would exceed projected housing supplies under current general plan and growth management policies. The Revised Draft Environmental Impact Report does not, as noted, clearly and without qualification, support this argument. The proponents' argument hinges upon a series of interrelated assumptions, as follows:

1. Proponents argue that employment growth in the project Primary Market Area (Livermore-Amador and San Ramon Valleys) will be approximately equal to the sum of estimated jobs in announced and/or approved projects in the PMA. ( In the Revised DEIR it is estimated that these would add between 86,100 and 99,100 new jobs, adjusting for vacancies and for secondary employment impacts. Year 2000 jobs would total between 136,500 and 149,500). However, no market demand analysis has been undertaken to test this assumption. Staff concludes that ABAG's recently released Projections '83 provides the best available approximation of such a market analysis. Projections '83 shows a net increase of approximately 74,100 jobs within the PMA (See Table 5.7b, below, which is hereby included in the Final EIR). This is much higher than future employment levels given in Projections '79; it nevertheless is considerably lower than the increase indicated in the projects-based estimate proposed by the proponents.

2. Proponents indicate that "Pleasanton and Livermore have ratios of 1.17 and 1.18 workers per household respectively. Presuming these ratios . . . to become comparable to other more established communities over time, an estimate of 1.35 workers per household provides a conservative estimate of housing demand." "(Wilsey &

Ham, letter of May 13, 1983. See D.2.5, below). A total demand for between 101,100 and 110,700 housing units results when this factor is applied to the "projects-based" projection of PMA jobs (139,500 to 149,500 total jobs in 2000); this would exceed the projected PMA housing supply (approximately 80,150 total units in year 2000).

Data from the 1980 Census of Population and Housing show that the current average number of workers per household (year round equivalent) is actually higher than that indicated above, or approximately 1.36 for residents of the PMA (See Table 5.17d, below, which is hereby included in the Final EIR). The adjusted average number of workers per household ranged from a low of 1.25 in Alamo, to a high of 1.45 in San Ramon. These represent an increase since the 1970 Census. According to a number of sources, including ABAG's Projections '83, the average number of workers per household is expected to increase through the 20 year projection period (Projected employed persons per household for Bay Area counties are given in Table 5.17c, below, which is hereby included in the Final EIR). For the year 2000, we conclude that it would be conservative to assume an average of 1.5 employed persons per PMA household (rather than 1.35 as proposed by the proponents). This would yield an approximate balance between projected jobs and projected employed residents in the PMA (See Table 5.17d, which is hereby included in the Final EIR).

3. Staff concurs with the conclusion of project proponents that many households supported by persons working elsewhere in the region will continue to choose the Livermore-Amador and San Ramon Valleys as their place of residence. Proponents state that "by the year 2000, out-commuters are estimated to represent a demand for approximately 43,500 housing units within the PMA. This is a net increase of approximately 14,700 units over existing stock." (Wilsey & Ham, letter of May 13, 1983: see D.2.6, below). This conclusion is based on ABAG's Projections '79, for total PMA households, on a recent Gruen Gruen & Associates survey, for 1980 percentages of out-commuters, and on assumptions, by Wilsey & Ham, regarding average numbers of workers per household and projected percentages of out-commuters. We do not concur with this conclusion, which makes no adjustment for revised assumptions regarding labor force participation rates or for projected shifts in jobs to the PMA. Rather, staff recommends the use of Projections '83 as the basis for estimating combined housing demand in the PMA and in surrounding subregional areas resulting from local and external changes in employment. (See Table 5.17e, below, which is hereby included in the Final EIR).



Table 5.7b  
ABAG PROJECTIONS '83  
PROJECTED EMPLOYMENT IN THE LAS POSITAS PRIMARY MARKET AREA: 1980 - 2000  
(1000s)

	1980	1985	1990	1995	2000	Net Change 1980 - 2000 Total #/yr.	
TOTAL: LAS POSITAS PRIMARY MARKET AREA							
Total Employment	50.3	59.2	77.0	102.4	124.4	74.1	3.71
Agric. & Mining	1.2	1.3	1.2	1.1	1.0	-0.2	-0.01
Manfg. & Wholesale	7.3	8.0	14.8	20.2	26.3	19.0	0.95
Retail	10.8	13.3	16.3	22.6	28.9	18.1	0.91
Services	19.2	21.6	26.4	33.8	38.1	18.9	0.95
Other	12.0	15.0	18.4	24.9	30.3	18.3	0.92
Livermore Area							
Total Employment	18.5	20.2	23.7	27.6	33.9	15.4	0.77
Agric. & Mining	0.4	0.4	0.4	0.4	0.3	-0.1	-0.01
Manfg. & Wholesale	2.3	2.1	3.0	3.6	4.8	2.5	0.13
Retail	2.3	2.8	3.2	4.3	5.5	3.2	0.16
Services	10.5	11.4	13.2	14.6	17.4	6.9	0.35
Other	3.0	3.5	4.0	4.8	6.0	3.0	0.15
Pleasanton Area							
Total Employment	9.2	12.2	19.3	28.3	37.4	28.2	1.41
Agric. & Mining	0.4	0.4	0.4	0.3	0.3	-0.1	-0.01
Manfg. & Wholesale	1.7	2.4	8.0	12.5	17.3	15.6	0.78
Retail	2.3	3.1	3.7	5.5	7.8	5.5	0.28
Services	2.2	2.7	3.1	4.3	4.3	2.1	0.11
Other	2.7	3.6	4.1	5.7	7.7	5.0	0.25
Dublin Area							
Total Employment	8.2	8.6	9.1	9.9	10.6	2.4	0.12
Agric. & Mining	-	-	-	-	-	-	-
Manfg. & Wholesale	1.2	1.1	1.2	1.3	1.5	0.3	0.02
Retail	3.2	3.6	3.9	4.4	4.7	1.5	0.08
Services	1.7	1.7	1.7	1.8	1.9	0.2	0.01
Other	2.2	2.2	2.3	2.4	2.5	0.3	0.02
Alamo-San Ramon-Danville							
Total Employment	14.5	18.8	24.9	36.6	42.5	28.1	1.41
Agric. & Mining	0.4	0.5	0.4	0.4	0.4	0.0	-
Manfg. & Wholesale	2.1	2.4	2.6	2.8	2.7	0.6	0.03
Retail	3.0	3.8	5.5	8.4	10.9	7.9	0.40
Services	4.8	5.8	8.4	13.1	14.5	9.7	0.49
Other	4.1	5.7	8.0	12.0	14.1	10.0	0.50

Source: Association of Bay Area Governments, Projections '83, June, 1983.  
Line items may not sum to totals due to independent rounding.  
Table prepared by Alameda County Planning Department, August 1983  
0453P

Table 5.16b  
 ABAG PROJECTIONS '83  
 PROJECTED OCCUPIED HOUSING UNITS (HOUSEHOLDS)  
 LAS POSITAS PRIMARY MARKET AREA  
 1980-2000

Year	Livermore	Pleasanton	Dublin	Alamo/ San Ramon	Danville	PRIMARY MARKET AREA TOTAL
1980	16,768	11,392	3,954	10,733	8,455	51,302
1985	18,450	12,280	4,880	12,200	9,250	57,060
1990	20,300	14,990	5,630	15,150	10,140	66,210
1995	22,350	17,720	6,210	16,440	11,380	74,100
2000	24,600	20,140	6,360	17,370	11,680	80,150
Net Change 1980-2000	7,832	8,748	2,406	3,637	3,225	28,848
#/year	392	437	120	181	161	1,442

Source: Association of Bay Area Governments, Projections '83, June 1983  
 Table prepared by Alameda County Planning Department, August 1983  
 o453P

Table 5.17b  
 ESTIMATED EMPLOYED PERSONS PER HOUSEHOLD  
 LAS POSITAS PRIMARY MARKET AREA COMMUNITIES  
 1980

	Total Employed Persons <sup>1</sup>	Year-Round Equivalent Employed Persons <sup>2</sup>	Households <sup>1</sup>	Total Employed Persons per Household	Year-Round Equivalent Employed Persons per Household
TOTAL	82,025	67,833	49,877	1.64	1.36
Livermore	25,596	21,251	16,230	1.58	1.31
Pleasanton	18,753	15,355	11,317	1.66	1.36
Dublin	7,098	5,727	3,954	1.80	1.45
Alamo	4,258	3,518	2,787	1.53	1.26
Danville	13,841	11,513	8,357	1.66	1.38
San Ramon	12,479	10,469	7,232	1.73	1.45

<sup>1</sup>1980 Census of Population

<sup>2</sup>Derived by Alameda County Planning Department

Table prepared by Alameda County Planning Department, August 1983



Table 5.17c  
PROJECTIONS '83  
EXISTING AND PROJECTED EMPLOYED PERSONS PER HOUSEHOLD  
NINE BAY AREA COUNTIES  
1980, 1990, and 2000

	1980	1990	2000
Alameda County			
Employed Persons	<u>522,100</u>	587,600	694,000
Households	426,092	468,800	530,100
Emp.Pers./HH	1.22	1.25	1.31
Contra Costa County			
Employed Persons	307,000	387,000	472,900
Households	241,534	294,400	347,400
Emp.Pers./HH	1.27	1.31	1.36
Marin County			
Employed Persons	118,200	134,400	160,000
Households	88,723	96,700	109,000
Emp.Pers./HH	1.33	1.39	1.48
Napa County			
Employed Persons	43,400	55,000	68,400
Households	36,624	44,300	52,200
Emp.Pers./HH	1.19	1.24	1.31
San Francisco County			
Employed Persons	<u>348,292</u>	368,300	403,700
Households	298,956	310,400	328,400
Emp.Pers./HH	1.16	1.19	1.23
San Mateo County			
Employed Persons	315,800	348,900	391,200
Households	225,201	244,000	269,400
Emp.Pers./HH	1.40	1.42	1.45
Santa Clara County			
Employed Persons	666,100	790,300	935,400
Households	458,519	525,600	589,900
Emp.Pers./HH	1.45	1.50	1.59
Solano County			
Employed Persons	<u>102,725</u>	129,000	171,500
Households	80,426	110,000	141,500
Emp.Pers./HH	1.13	1.17	1.21
Sonoma County			
Employed Persons	131,000	176,000	233,000
Households	114,474	144,600	184,400
Emp.Pers./HH	1.15	1.22	1.26

Source: Assoc. of Bay Area Govts., Projections'83, June 1983  
Table prepared by Alameda Co. Planning Dept., August 1983

Table 5.17d  
 EXISTING AND PROJECTED RATIO OF JOBS TO EMPLOYED RESIDENTS  
 LIVERMORE-AMADOR AND SAN RAMON VALLEYS,  
 LAS POSITAS PRIMARY MARKET AREA  
 1980 and 2000

	1980			2000		
	Jobs <sup>1</sup>	Employed Persons <sup>2</sup>	Ratio of Jobs to Emp.Pers	Jobs <sup>1</sup>	Employed Persons <sup>3</sup>	Ratio of Jobs to Emp.Pers
Primary Market Area-TOTAL	50,373	67,833	0.74	124,400	120,225	1.03
Livermore-Amador Valley	35,948	42,333	0.84	81,900	76,650	1.07
San Ramon Valley	14,425	25,500	0.57	42,500	435755	0.98

<sup>1</sup> Source: Association of Bay Area Governments, Projections '83, June 1983.

<sup>2</sup> Estimate by Alameda County Planning Department, based on 1980 Census of Population.

<sup>3</sup> Estimate by Alameda County Planning Department. Assume 1.5 employed persons per household; total households per ABAG's Projections '83: see Table 5.16b.

Prepared by Alameda County Planning Department, August 1983

Table 5.17e  
ABAG PROJECTIONS '83  
PROJECTED JOBS AND OCCUPIED HOUSING UNITS (HOUSEHOLDS)  
ALAMEDA AND CONTRA COSTA COUNTIES, AND GEOGRAPHIC SUBAREAS  
1980, 1990, and 2000

Area	1980	1990	2000
Alameda and Contra Costa Counties			
Jobs	715,314	846,000	997,600
Occupied Housing Units	667,626	763,160	877,500
Jobs/Housing Ratio	1.07	1.10	1.14
Alameda County			
Jobs	511,106	581,000	674,900
Occupied Housing Units	426,092	468,790	530,100
Jobs/Housing Ratio	1.20	1.23	1.27
Northern Alameda County			
Jobs	285,835	306,300	336,100
Occupied Housing Units	225,628	237,170	245,280
Jobs/Housing Ratio	1.27	1.29	1.37
Central Alameda County			
Jobs	133,710	144,200	159,100
Occupied Housing Units	101,564	110,940	137,000
Jobs/Housing Ratio	1.32	1.30	1.16
Southern Alameda County			
Jobs	53,856	73,000	89,600
Occupied Housing Units	65,283	77,760	93,430
Jobs/Housing Ratio	0.82	0.93	0.95
Livermore-Amador Valley			
Jobs	35,948	52,100	81,900
Occupied Housing Units	32,114	40,920	51,100
Jobs/Housing Ratio	1.12	1.27	1.60
North Eastern Contra Costa County			
Jobs	20,025	24,900	29,400
Occupied Housing Units	33,238	44,860	64,710
Jobs/Housing Ratio	0.60	0.56	0.45



(Table 5.17b continued)

North Central Contra Costa			
County			
Jobs	49,333	65,800	79,700
Occupied Housing Units	51,932	59,940	67,860
Jobs/Housing Ratio	0.95	1.10	1.17
North Western Contra Costa			
County			
Jobs	9,106	9,900	11,800
Occupied Housing Units	12,112	13,640	14,540
Jobs/Housing Ratio	0.75	0.72	0.81
Western Contra Costa			
County			
Jobs	46,145	53,300	57,900
Occupied Housing Units	56,991	66,890	74,790
Jobs/Housing Ratio	.81	.80	.77
Central Contra Costa			
County			
Jobs	62,105	82,500	108,600
Occupied Housing Units	61,752	70,700	75,230
Jobs/Housing Ratio	1.01	1.17	1.44
Rural East Contra Costa			
County			
Jobs	1,566	1,900	2,900
Occupied Housing Units	4,823	10,890	17,970
Jobs/Housing Ratio	0.84	0.90	0.93
San Ramon Valley			
Jobs	14,425	24,900	42,500
Occupied Housing Units	19,188	25,290	29,650
Jobs/Housing Ratio	0.75	0.98	1.43

Source: Association of Bay Area Governments, Projections '83, May 1983  
 Table prepared by Alameda County Planning Department, August 1983  
 0453P

D.2.0. Wilsey and Ham, letter of May 13, 1983

D.2.1 "The discussion of employment projections . . . and the selection of "trend" projections as the basis for analysis conflicts with the actual development activity currently underway within the Primary Market Area . . . Without a discussion of the assumptions and methodology used to revise the (ABAG) Projection 79 numbers it must be assumed that the Primary Market Area is still considered a "bedroom" community for the remainder of the region. By simply applying this new (regional and East Bay) growth rate to the old Projections 79 forecasts (as is done for the Adjusted Growth Rate Trend Projection) the role of the PMA remains unchanged relative to the rest of the region; that as a bedroom community . . . This assumption is clearly unreasonable given the actual commercial/industrial employment growth now underway in the PMA. In light of the development pressures and announced projects in the PMA, it appears unreasonable to assume that employment growth will be experienced at an East Bay or even regional average growth rate."

Response: The two "Trend" projections of PMA employment were developed by Planning Department staff as straight-line projections of recently reported 1975-1980 employment trends. They were prepared as alternates to the "projects-based" and ABAG Projections '79 projections of employment. The former could be taken as a "high" projection, insofar as full buildout (through 2000) of the announced/approved commercial and industrial projects is assumed, without adjustment to account for the PMA's market advantages or disadvantages relative to other subregional areas. The latter, ABAG '79 projections are no longer considered to be valid insofar as they were developed prior to, and do not reflect recent strong rates of employment growth in the PMA. ABAG's updated projections for subregional areas were not available at the time of the Revised DEIR's release. Projections '83 has been completed and adopted; data pertinent to the current analysis is included in the Final EIR and are used as the primary basis for evaluating the relationship of the Las Positas project to anticipated changes in housing, employment and population within the PMA and region.

D.2.2 "The basic employment growth allowed for in Las Positas would in no way constitute a net increase in employment to that otherwise projected for the PMA. These employment areas would result in a redistribution of basic employment growth within the PMA . . . The supply of vacant land would have the effect of keeping land prices relatively low, thus reinforcing the PMA as a competitive area for commercial/industrial development relative to the rest of the region."

Response: This assertion has not been substantiated. The conclusion reached in the DEIR, p. 5-32, is that "lacking a

comprehensive market demand analysis for the Livermore-Amador and San Ramon Valleys, it is not possible to clearly indicate whether all of the basic employment growth indicated for the Las Positas project would constitute a net increase to that otherwise projected for the Valleys, or a redistribution of basic employment growth. An effect somewhere between these extremes is probable. For purposes of evaluating project impacts on air quality, traffic, water supply, and public costs and revenues, a "worst case" assumption is made that all employment in Las Positas is new to the PMA." The consequences of Las Positas as an addition or as a redistribution of PMA employment are generally discussed in the Revised DEIR.

- D.2.3 "We believe these trend projections are based on unsound assumptions and do not reflect the actual employment growth currently being planned for the PMA. Employment projections approximating the Announced/Identified Projects Forecast should be assumed for the PMA, and should form the basis for analyzing housing demand in this section for the RDEIR."

Response: Refer to staff's response to D.2.1. Staff recommends that projections of employment for the PMA communities included in ABAG's Projections '83 provide a more appropriate basis for this analysis than do those based on the sum of potential employment in announced/identified commercial and industrial projects or those derived through straight-line projection of recently reported trends.

- D.2.4 " . . . demand for new housing in the PMA due to the area's continued role as a housing reservoir for the remainder of the region is estimated using ABAG's 1979 housing forecasts . . . It is reasonable to assume that the PMA will continue to be a housing resource for the rest of the region, but that the percentage of the total local workforce employed locally will increase . . . (S)ome of the jobs ABAG expected local resident(s) would be commuting to will actually be located in the PMA . . . Demand for local new housing will increase as local employment opportunities increase. This stimulus for housing growth will be somewhat independent of the region-wide forces which have and will continue to stimulate local housing growth."

Response: We question the use of Projections '79 data to estimate amounts of externally generated housing demand impacting the PMA. Refer to the response to D.1.1.

- D.2.5 "A recent survey completed by Gruen Gruen & Associates (A Survey Analysis of the Employment, Demographic and Housing Characteristics of the Hacienda Business Park Labor Pool) suggests that in 1980



there were approximately 38,850 workers from the PMA . . . commuting to jobs outside the PMA. As shown in Table A, this suggests that in 1980 approximately 57% of the households residing within the PMA were supported by jobs outside the PMA. In calculating this percentage, a workers per household factor of 1.35 was used. Shown in Table B are the 1980 workers per household and jobs to housing ratios for a number of Bay Area communities . . . Pleasanton and Livermore have ratios of 1.17 and 1.18 workers per household respectively. Presuming these ratios . . . to become comparable to other more established communities over time, an estimate of 1.35 workers per household provides a conservative estimate of housing demand. Additionally . . . The GG&A survey reported 1.52 workers per household within the PMA . . .

Response: The cited Gruen survey indicated that approximately 35 percent of persons 16 years and older living in the San Ramon and Livermore-Amador Valleys commuted to jobs outside the Valleys. This is roughly 35,800 persons. Based on this estimate the Gruen report concludes that "almost half (47.9 percent) of Tri-Valley residents who are employed commute to jobs outside the Tri-Valley". By extension, this would mean that slightly less than half of households (rather than 57 percent) were supported by persons working outside the Valleys.

The estimates of workers per household referred to for Pleasanton and Livermore are apparently from ABAG's Preliminary Projections '79, and represent ABAG's projections to 1980 from a 1975 base year estimate. The Gruen study indicated a 1980 average of 1.77 workers per household for the PMA (or Tri-Valley) if both employed persons and persons looking for work are included. "If only full-time workers are counted, there were 1.52 workers per household." The 1980 Census data shows an average of 1.64 workers per household, including both full- and part-time workers with no adjustment for those working less than a 52 week year. With this adjustment, an average of 1.36 workers per household is derived. As indicated in the response to Supervisor Cooper (D.1.1, above) it is reasonable to expect that this average will increase through the 20 year projection period.

D.2.6 "Table A - Housing Demand Created in the Primary Market Area by Persons Working Elsewhere"

"In Table A, projections for the year 2000 assumes a slight decline in the proportion of households with workers commuting outside the PMA (from 57% to 50%). The projections are based solely on ABAG's forecasts for the area, which did not account for

the great increase in local employment now occurring in the PMA. By the year 2000, out-commuters are estimated to represent a demand for approximately 43,500 housing units within the PMA. This is net increase of approximately 14,700 units over existing stock."

Response: Note the preceding response regarding 1980 rates of out-commuting, as indicated in the Gruen report. The projections included in Wilsey & Ham's Table A, cited above, are of total households within the PMA, taken from Projections '79. (The updated Projections '83 indicate a slight reduction in the number of year 2000 households in the PMA, or approximately 80,150 versus 82,942). What the Table serves to show is simply that by year 2000 approximately half of the total occupied units in the PMA would be occupied by households supported by persons working elsewhere; this is not strictly equivalent to housing demand associated with job growth outside the PMA, as is implied. Modeling of regional housing and economic trends, such as that of Projections '83, is a preferable methodology to indicate amounts and distribution of employment growth within the region and, based on all local residential and housing policies (among other factors) the probable distribution of resultant housing demand. Staff concludes that Projections '83 provides the best approximation of such a distribution of housing demand.

- D.2.7 "The other half of the housing demand equation is the demand created by the influx of new jobs into the area. . . . It is assumed that approximately 60 percent of the new jobs would (be held by local residents), while 40 percent would be held by persons residing outside the PMA. Thus of the 90,000<sup>±</sup> new jobs in the PMA over the next 20 years, approximately 53,000 would be held by local residents. Applying a factor of 1.35 workers per household yields a housing need attributable to PMA employment of 39,000 units. Combining this demand with the housing demand from out-commuters yields (a) marginal housing need of 53,700 units. (There would be) a housing "shortfall" of approximately 20,000 units."

Response: Refer to the response to Supervisor Cooper's comment (C.1.1, above). This statistical "shortfall" can of course be reduced or eliminated through an adjustment in the basic assumptions. ABAG's revised projections indicate an increase of approximately 74,100 new jobs in the PMA through year 2000, rather than the 90,000 or so suggested. It is somewhat speculative as to the percentage of these which would be held by local employed residents. Wilsey & Ham have suggested 60 percent; the Revised DEIR has used a range, from about half to around 80 percent. The



projected average number of workers per household is also debatable, but may be expected to increase from the current estimated average for the PMA of 1.36 workers per household, to 1.5 or more by year 2000, rather than 1.35. Further, the actual demand for housing within the PMA associated with employment growth elsewhere in the region may be less than that suggested.

D.2.8 "Adjustments in the assumptions used in the current estimates, as well as adjustments in local land use policies affecting both employment and residential development . . . could significantly alter the results."

Response: We concur.

D.2.9 " . . . the impacts of Las Positas would be to provide approximately 13,500 new housing units . . . by (the year) 2000. These . . . would meet 67% of the expected housing shortfall caused by local employment growth in the PMA."

Response: As noted in the EIR, and as indicated in the previous responses to comments, such a "housing shortfall" may be minimal or nonexistent.

D.3.0 Comments by the City of Livermore on the Revised Draft Environmental Impact Report . . . received May 16, 1983.

D.3.1 "The DEIR appears to conclude that Las Positas will not significantly affect the Project Market Area . . . jobs to housing ratio. However this conclusion is based on faulty assumptions . . . resulting in a serious underestimate of the number of jobs . . . in the PMA by 2005 and consequently in inadequate analysis of environmental and fiscal impacts resulting from that job increase . . . ."

Response: The Revised DEIR includes a series of employment projections for the PMA; each is necessarily based on sets of assumptions. Staff does not agree that, as suggested in the comment, a projection of employment based simply on the summation of potential jobs in announced commercial and industrial projects in the PMA is any less faulty than a straight-line projection based on estimates of recent trends. Both sets of projections were developed in the absence of an update of ABAG's Projections '79, which included employment projections for the PMA generally considered to be too low, when compared to recent employment trends in the PMA. Projections '83 has subsequently been completed and adopted; projections for the PMA are included in this Final EIR.



Staff agrees that the project must be evaluated in the context of both existing and projected conditions, in order to establish the net effects of the project over time. It is reasonable and appropriate to define these in terms of alternatives (or ranges) where there are uncertainties or differences in opinion regarding future conditions. Staff does not agree that it is the required function of the current EIR to evaluate, in detail, the broad range of impacts associated with these changing external conditions, although a number of significant cumulative impacts have been addressed (e.g., water supply and demand; traffic; air quality).

- D.3.2 " . . . (The) conclusion that construction of Las Positas will not affect the jobs/housing ratio, mistakenly assumes employment figures based on ABAG's 1979 population projections . . . "

Response: The conclusion, on page 5-51 of the RDEIR, is based on a "Trend" projection of employment; this projected amount is higher than that given in Projections '79.

- D.3.3 "The DEIR should . . . use far more reliable and accurate employment projections based on those projects already planned or identified for the Primary Market Area. Elsewhere, the DEIR points out that based on those updated figures, 86,100 to 99,100 new jobs are predicted in the PMA . . . (apparently excluding Las Positas), far more than the estimate of 37,500 to 50,000 new jobs . . . used by the DEIR in predicting no excess of jobs . . . Projections based on the figures on planned and identified employment projects show a shortfall of nearly 20,000 housing units by the year 2005, rather than the excess predicted in the DEIR. The various impacts of this imbalance must be analyzed in the DEIR."

Response: Refer to previous responses regarding alternative employment projections for the PMA. The statistical imbalance referred to would (under the "projects-based" projection of employment) result without the addition of the Las Positas project. Again, the EIR has considered the potential relationships of the project to changing conditions (or assumptions regarding the same) within the PMA and region, and has analyzed certain cumulative impacts. It is not the function of the EIR to evaluate in detail the environmental effects of changes in the PMA which are external to the current project.

- D.3.4 "It is difficult to discern the precise source of the DEIR's projections, since the DEIR makes two 1980-2000 "trend" projections: one based on extrapolation of 1975-1980 trends, and one based on ABAG 1979 projections, using updated 1983 data."

Response: As indicated in the Revised DEIR, the two Trend projections were developed by staff.

- D.3.5 "Relying upon a study of the Bay Area region by Gruen Gruen & Associates . . . the DEIR chose 1.6, the midpoint of the range, as an appropriate multiplier for Las Positas. Use of an average Bay Area region multiplier for a new town in the Livermore-Amador Valley is clearly inappropriate . . . Las Positas (would) create a much greater than average demand for secondary jobs . . . A higher multiplier, perhaps even higher than 1.9 (is warranted). At minimum, a range of multipliers should be used . . . "

Response: As used in the Gruen analysis, the secondary employment impacts within the region relate primarily to "direct" employment sectors, rather than to specific locations of this employment. The project's location would affect the subregional distribution of this secondary employment. In the Gruen analysis, it was assumed that approximately 20 percent of secondary employment would locate in the PMA; this was considered an "upper bound" for the PMA. If the proposed Las Positas business/office/industrial parks were isolated from other major employment areas, it could be expected that a higher proportion (more than 20 percent assumed in the DEIR)) of the secondary impact would locate in the PMA or in the Livermore area. Given the significant amounts of commercial and industrial development which has been projected for nearby areas in the PMA, staff concludes that the 20 percent assumption is reasonable.

- D.3.6 " . . . analysis of the secondary employment of construction activity is improperly excluded from the DEIR"

Response: According to Gruen Gruen & Associates, residential and commercial/industrial construction employment are a component of total "secondary employment" induced by changes in "direct" employment.

- D.3.7 " . . . the DEIR should analyze and apply updated information available from ABAG concerning regional employment and housing trends. Those data should be applied to the ABAG plans and policies . . . and appropriate revisions should be made to the DEIR."

Response: Updated ABAG projections for subregional areas -the PMA- were not available in time to be included in the Revised DEIR. Projections '83, including subregional projections of jobs, housing, and population, have since been completed and adopted. Data from this report are included in the current Final EIR.



D.4.0 ABAG, letter of May 16, 1983.

- D.4.1 "While a laudable goal, its achievement appears to be unlikely. Several of the assumptions upon which the Las Positas proposal relies are exceedingly optimistic and/or not in keeping with prevailing local conditions. First, the projected number of workers who will live in Las Positas is based upon an assumed 1.35 workers per household. This is an exceptionally low estimate in light of the current (1980 Census) figures of 1.4 to 1.6 workers per household in the subregional area. An assumption of 1.5 workers per household by the year 2005 would result in a total of 27,000 workers living in Las Positas by that time. Moreover, there is every reason to assume that the actual number of workers per household will continue to increase rather than remain constant . . . ."

Response: 1980 Census data for the PMA indicates an average of 1.64 workers per household, including both full and part time workers, with no adjustment for weeks worked. Staff estimates an average of 1.36 year-round equivalent workers per household when the basic data is adjusted for workers employed less than a full 52 week year. Staff agrees that work force participation has been increasing. In the current FEIR the consequences of a higher figure (1.5 to 1.8 workers per household) is considered in evaluating projected jobs/housing relationships.

- D.4.2 . . . the projected 22,200 jobs in the project itself also appears to be an optimistic figure. This projection, if realized, would result in approximately 45 employees per acre on commercially developed property. Again, this is a rather high estimate. A more typical--and more realistic--estimate would be approximately 30 employees per acre. This would result in only about 16,300 jobs rather than 22,200."

Response: Refer to Table 5.11, page 5-29, of the Revised DEIR. The above calculation apparently includes only project Commercial and Business Park acreage (483 acres); it does not include approximately 250 acres of Public and Institutional. The total jobs noted - 22,200 at buildout- includes approximately 21,100 in commercial and industrial areas, and approximately 1,000 in public and institutional uses. Assumed average densities are 35 employees per acre in Office Commercial and Business/Industrial Park areas, and 20 employees per acre in the Town, Village and Neighborhood Commercial Centers. These densities are comparable to that suggested in the ABAG comment and to densities in other similar



developments. No adjustment to the projected employment figures (assuming full buildout) is required.

D.4.3 " . . . The projected ratio of 1.1 workers per job in Las Positas appears unrealistic. A far more likely ratio is in the range of 1.6-1.7, based upon approximately 27,000 workers and approximately 16,300 jobs."

Response: Per staff's response to D.4.2, above, jobs in Las Positas would total approximately 22,200, rather than 16,300. If the number of employed residents is increased to 27,000 (assuming 1.5 workers per household) the ratio of employed residents to jobs in Las Positas would be 1.2 (the ratio would be 1.46 workers per jobs if an average of 1.8 workers per household is assumed). This would reduce the housing "demand" impacts associated with commercial and industrial development proposed for Las Positas..

D.4.4 " . . . the projection of 22,000 jobs assumes full project buildout. Given the magnitude of the Las Positas project as a whole, any assumption of complete buildout on schedule appears to be speculative at best. Unfortunately, the development of residential units is scheduled to move forward at a more rapid initial pace than is the development of commercial and industrial sites within the project. Approximately one third of the projected jobs are not planned until after the year 2000. Thus, if complete buildout is not achieved, it is reasonable to expect that it will be jobs that will fall short, rather than homes."

Response: This potentiality is acknowledged in the Revised DEIR. A project with lesser amounts of internal employment is addressed as Alternative 7.4 (p.7-6 of the RDEIR).

D.4.5 " . . . the discussion of Housing Need and Affordability on pp. 5-52, 53 is confusing. Table 5.24 is entitled "Anticipated Las Positas Housing Program." It shows Housing Type/Density, Number of Units, and Average Sales Price/Unit. The associated text states that the table indicates sponsor's anticipated housing costs by type (emphasis added). Developer's costs and sales price are not interchangeable. Either the developer's cost should be lower or the sales price higher--to represent the addition of land cost and developer's profit to the sales price . . ."

Response: Project planning consultants indicate that the sales price per unit figures included in Table 5.24 are the anticipated housing costs to the purchasers, or sales prices, not the costs of the developer building the housing units. The consultants indicate

that the estimated prices were developed by reviewing selling prices of comparable housing in Alameda and Contra Costa counties during 1981. The projected selling prices do not represent the sum of independently developed estimates of land costs, construction costs, builders' profits, development and land transfer fees, etc.. As discussed in Section 5.8 of the Revised DEIR (p. 5-159) "the land sale price revenues received by . . . landowners from developers/builders could reflect the cost that the latter would incur because of imposition of the public land acquisition fee. Because subsequent development costs and sales prices are relatively fixed, the addition of the fee at the early stage of the development process could tend to reduce land sales price returns to the . . . landowners. The developers/builders would be required to carry any costs that are not offset by reduced land prices in their construction financing. . . In a weak market, the developer/builder would realize smaller profits due to either rents or lower sales prices, or to an extended carry of the inventory. A major burden could also fall on future residents and businesses. . . All capital costs not offset by lowered purchase prices for the land would be added directly to the purchase price of the residential, commercial or industrial units. . . "

- D.4.6. " . . . Table 5.24 and accompanying text should be clarified in the FEIR to distinguish between developer's cost and sales price, and dollar amounts adjusted accordingly. Dollar amounts should also reflect the costs of new infrastructure to the extent that they are to be borne by the consumer."

Response: Refer to the response to Comment D.4.4. Estimates of per unit costs for basic infrastructure were given in section 5.8 of the EIR.

D.4.7 (a) "The DEIR states that, based on these anticipated sales prices, approximately 85 percent of the total would be available to moderate and low income households. Of these, 7 percent are proposed as manufactured housing with an estimated average sales price of \$50,000. Presumably, these are the units that would be available to low income households."

(b) Whether the \$50,000 is the developer's cost or the sales price, once utility and maintenance expenses are added, it is unlikely that many lower income employees would be able to live in Las Positas without innovative financing programs or rent subsidies."

Response: (a) Further analysis has been undertaken to test the statement that approximately 15,400 units, or 85 percent of the total, would be affordable to moderate and low income households" (p.5-52 of the Revised DEIR). This conclusion was originally based on an evaluation of income and housing prices developed by Wilsey and Ham, which was included in June 1982 DEIR. Staff directed Wilsey and Ham to provide clarification of their methodology. Staff also directed the fiscal consultants, Angus McDonald and Associates, to assist it in testing the earlier findings regarding the "affordability" of the proposed housing prices.

Certain critical assumptions were basic to the Wilsey & Ham analysis. These are identified and briefly evaluated here.

#### Income Categories

In the Wilsey & Ham evaluation it was assumed that the incomes of HUD defined "Low" and "Moderate" income households living in the Livermore-Amador Valley area will be higher than the County averages for these groups. Two reasons are given: the "Median" income (which is the basis for defining Low and Moderate income groups) of Valley households is higher than that for the County; and the Valley median is expected to increase in proportion to projected increases in the number of employed persons per household.

This is an inappropriate use of the standard HUD definitions. These are prepared for the County, not for smaller geographic units. Further, while household incomes may increase over time, housing costs may also increase. In the revised analysis, below, proposed housing costs, in current (1982) dollars, are compared to current (1982-83) HUD household income categories for the County.



#### Housing Costs/Mortgage Rates

It was assumed that interest rates would stabilize between twelve and fifteen percent. To establish cost of housing affordable to each income category, Wilsey & Ham assumed a 12 percent mortgage over thirty years for their "high" estimate, and 15 percent for a "low" estimate. A 12 percent mortgage rate is reflected in their estimate of 85 percent affordable housing. No further assumptions were made regarding housing costs for taxes, insurance, downpayment, etc.).

In the following revised analysis, the effects on "affordability" of a range of mortgage rates are indicated. The current analysis also includes taxes and insurance payments as a part of the total housing cost.

#### Available Income for Housing

It was further assumed by Wilsey & Ham that residents will pay between 35 and 40 percent of gross household income for housing mortgages. The higher figure was used in the analysis.

This tends to overstate income available for housing. The more conventional rule is that no more than one third of household income should be spent on housing; in the following, revised analysis it is assumed that 30 percent of gross income will be devoted to principal and interest, property taxes, and insurance.

#### Revised Housing Affordability Analysis

The current analysis, prepared by the Planning Department and McDonald Associates, shows that no more than seven percent of the housing in Las Positas would be affordable to Moderate income households. Most of the proposed housing prices would be affordable only to households with "Above Moderate" incomes, or to those with annual incomes of \$38,000 or more. Correspondances between proposed unit sale prices (averages for the unit type) and household incomes required to afford these are shown in Table 5.24b. Correspondances between annual incomes of Very Low, Low, Moderate and Above Moderate Households (four person and two person households) and the prices of units which these households could afford are shown in Table 5.24c. Comparing these two sets of figures it is apparent that only the proposed detached manufactured residences (priced at \$50,000 per unit) would be affordable to the Moderate income group (those with incomes at or close to 120 percent of the County median, or approximately \$24,000 per year).

None of the proposed prices would be affordable to Low and Very Low income households.

Innovative financing programs, such as mortgage revenue bonds, would make more of the proposed housing affordable to Moderate income households (Attached Unit townhouses and condominium apartments, and Zero lot detached units), and would make the manufactured units affordable to a portion of the Low income group. It is also possible, as conditions of approval of the Plan amendment and rezoning, to require that a reasonable percentage of units in all housing projects within the Las Positas development be affordable to and/or made available to Very Low, Low, as well as Moderate income households.

(b) As proposed, the costs of major capital improvements would be a part of, rather than an addition to the stated housing prices. These sales prices units would be relatively fixed, in order for residential developments in Las Positas to be competitive with projects elsewhere in the market area.

All ongoing revenues to the proposed CSA would be derived from user charges for services provided by the CSA. These charges would be collected for each specific service and would cover the operating costs of that service, plus an amount used for replacement or modernization costs, as required, and administrative overhead. Average annual fees for sewage, potable water, and street lighting are estimated to be approximately \$43 per month in Phase I, and approximately \$40 per month in the final three phases and following buildout (RDEIR, p. 5-170). These fees would represent only about seven percent of the total costs (mortgage, taxes, insurance, specified utility fees) of the least expensive unit proposed (detached, manufactured unit selling for \$50,000), and in itself would not adversely affect the "affordability" of this or other proposed housing types.

Table 5.24b  
Las Positas Housing  
Annual Income Required<sup>1</sup> at Proposed Unit Prices

Residential Unit Type	Detached Unit				Attached Unit	
	Large Lot	Average Lot	Zero Lot	Manfg	Town- house	Condo/ Apt
Proposed Average Unit Price	\$165,000	\$120,000	\$105,000	\$50,000	\$82,500	\$93,750
Number of Units	812	1,779	5,009	1,200	4,680	4,500
% of Total Units	5%	10%	27%	7%	26%	25%
Amount Financed	\$148,500	\$108,000	\$94,500	\$45,000	\$74,250	\$84,375
Monthly Insurance	48	35	31	15	24	27
Monthly Taxes	158	115	101	48	79	90
<u>Conventional Mortgage @ 13.75 percent:</u>						
Total Monthly Payment	1,936	1,408	1,232	587	968	1,100
Annual Income Required	77,500	56,300	49,300	23,500	38,700	44,000
<u>Conventional Mortgage @ 13.0 percent:</u>						
Total Monthly Payment	1,849	1,345	1,177	587	924	1,051
Annual Income Required	74,000	53,800	47,100	22,400	37,000	42,000

<sup>1</sup> Assumes 30 percent of annual income will be devoted to principal and interest, property taxes and insurance payments. Down payment is assumed to be 10 percent of unit price. Mortgage term is assumed to be 30 years.

Source: McDonald & Associates, September 1983

Table assembled by Alameda County Planning Department, September 1983



Table 5.24c  
 Estimated Affordable Housing Prices  
 By Income Category

	Income Category and percent of Median <sup>1</sup>			
	Very Low 50% or less	Low 50 - 80%	Moderate 80 - 120%	Above Moderate 120% or more
<hr/> Four Person Household <hr/>				
Annual Income	\$15,250 or less	\$15,250- \$24,400	\$24,400- \$36,600	\$36,600 or more
 <u>Affordable Housing Price</u>				
<u>Conventional Financing</u>				
13.75% Mortgage <sup>2</sup>	\$32,300 or less	\$32,300- \$51,700	\$51,700 \$77,600	\$77,600 or more
13.0% Mortgage <sup>2</sup>	\$34,000 or less	\$34,000- \$54,400	\$54,400- \$81,600	\$81,600 or more
 <u>Mortgage Revenue Bonds</u>				
10.0% Mortgage <sup>2</sup>	\$41,600 or less	\$41,600 \$66,600	\$66,600 \$99,900	\$99,900 or more
<hr/> Two Person Household <hr/>				
Annual Income	\$12,250 or less	\$12,250- \$19,550	19,550- \$29,350	\$29,550 or more
 <u>Affordable Housing Price</u>				
<u>Conventional Financing</u>				
13.75% Mortgage <sup>2</sup>	\$26,000 or less	\$26,000- \$41,500	\$41,500- \$62,200	\$62,200 or more
13.0% Mortgage <sup>2</sup>	\$27,300 or less	\$27,300- \$43,600	\$43,600- \$65,500	\$65,500 or more
 <u>Mortgage Revenue Bonds</u>				
10.0 % Mortgage <sup>2</sup>	\$33,400 or less	\$33,400- \$53,400	\$53,400- \$80,100	\$80,100 or more

<sup>1</sup> \$31,600 for a family of four; \$24,450 for a two person household. Alameda County Preliminary Household Income, HUD, September 1981.

<sup>2</sup> Assumes 30 percent of annual income will be devoted to principal and interest, property taxes and insurance. Mortgage term is 30 years.  
 Prepared by Alameda County Planning Department, September, 1983

- D.4.9 "The County should consider innovate financing programs with respect to Las Positas. Specifically, recommend consideration of mortgage revenue bond issuances to write down interest rates, especially for first-time buyers, and development agreements to ensure that units initially affordable to low and moderate income households remain so for a specific time period."

Response: The recommendation is noted. The County has issued Mortgage Revenue Bonds in 1983 in other areas.

- D.4.6 "In modifying assumptions about the percentage of internal and external trips used in the traffic and air quality analyses, consideration should be given to the likelihood that, although the project would provide lower income employment, it may not provide commensurate housing opportunities for lower income households."

Response: The comment is acknowledged.

- D.5.0. Linda Best, Executive Secretary, Coalition of Labor and Business, letter of May 12, 1983

- D.5.1 "Last year COLAB commissioned a study by Menkin/Lucero and Associates to project housing demand for Alameda and Contra Costa Counties through 1990, with special emphasis on 1980-85. The intent was to insure that projections adopted by ABAG, pursuant to the requirements of AB 2853, would be as accurate as possible and based on current census data . . . We believe that the COLAB report has significance for your deliberations.

The report projects a demand for new housing in Alameda County of 43,000 units through 1985. Of that amount, 7,900 are projected for the unincorporated area. The Alameda County Board of Supervisors, in their action on the numbers, determined that 7,900 was conservative considering the activity in the area and adopted a range with 4,991 as the low and 10,000 as the high.

What may be of even greater significance is the disparity between this demand and the estimated increase in housing supply through 1985. Based on surveys of local jurisdictions, the report projects a disparity of 17,000 units for the County as a whole and a disparity of 5,610 for the unincorporated area . . .

We believe this disparity is a significant one and one which is likely to increase beyond 1985, as Hacienda Park and Bishop Ranch develop and job growth increases dramatically.

Las Positas can be a significant help in beginning to narrow this gap between supply and demand. We urge you to approve the project."

Response: The comment is acknowledged. ABAG, in conjunction with local agencies, has developed updated, 1983 housing need figures. These have been approved by ABAG and the County and are on file at the Planning Department offices.



E. Public Plans and Policies

County of Alameda General Plan

E.1.0 City of Livermore, letter received May 16, 1983.

E.1.1 " . . . the DEIR . . . fails to identify the overall impacts associated with massive nonconformance with the County General Plan policies, as set forth in the Livermore-Amador Valley Planning Unit General Plan . . . The DEIR should be revised to assess the valleywide impacts (including other unincorporated developments which may follow Las Positas) associated with general plan amendments which would be required by the project as proposed."

Response: State EIR Guidelines require that an EIR include a description of the environmental setting, including a discussion of "any inconsistencies between the proposed project and applicable general plans and regional plans" (Section 15142). The discussion of inconsistencies with the County General Plan is included in Section 5.3 of the RDEIR. The EIR, in its entirety, is intended to identify the significant environmental impacts which would result from amendment to the County General Plan, to approve the Las Positas project as it is currently proposed. Amendment to the Plan land use and circulation diagram to change designations in the Las Positas project area from Agricultural to Urban Residential, Commercial, Industrial, etc., is clearly permitted by law provided that such amendment is "in the public interest" (Government Code Section 65356.1), and provided that the amendment is consistent with the rest of the general plans or that appropriate changes have been made to the plan to maintain consistency.

The primary valleywide impacts which would be associated with an amendment to the County General Plan to permit the proposed development are discussed on page 8-2, under project Growth Inducing Impacts. There it is stated that "an action by the County to approve (the proposed) "package" of proposals, could. . . establish a precedence for other similarly situated properties in the unincorporated County. The "quantitative" impact cannot be measured at this time."

E.1.2 (1) . . . except in one instance . . . the DEIR does not analyze mitigation measures or alternatives which could eliminate the inconsistency with general plan policies. (2) The DEIR should be revised to include a discussion whether each of the policy impacts is significant or insignificant and whether it is mitigable or avoidable."

Response: The degree of project consistency or inconsistency with Plan environmental policies are reviewed in Section 5.3, pages 5-57 through 5-67. A number of Plan policies establish County objectives regarding the impacts of future development on environmental conditions, natural and man-made. Section 5.3 addresses project consistency with these objectives; the severity of project impacts on most environmental conditions, and proposals for mitigation, are discussed by environmental category in other sections of the RDEIR.

The County General Plan, and specifically, the Livermore-Amador Valley Planning Unit General Plan (a Part of the County General Plan) also establishes general objectives regarding the character of future urban development in the Planning Unit and the responsibilities for regulation of land uses and provision of public services. These Plan policies go beyond general environmental issues and do deserve additional discussion. The following may be considered the "core" of County policy objectives regarding the control of urban growth in the Planning Unit:

2a. Within the context of LAFC policies for two Valley Spheres of influence, promote the three existing Planning Unit Communities as centers of future urban development.

3a. All urban development shall be within incorporated areas in order to promote the coordination of land use planning and provision of public services.

3b. To discourage the establishment of special districts that provide public services to urban development and do not have the authority to plan land use in order to discourage sprawl, fragmented development, and fragmented governmental control of services and planning.

The proposal for establishment of a new service entity - a County Service Area governed by the Board of Supervisors - is not considered consistent with provisions of these Plan objectives which encourage future urban development to be located within and under the control of the three existing municipalities - Livermore, Pleasanton and Dublin. However, the DEIR rightly notes that this same governmental/administrative arrangement would allow for effective coordination, under the Board of Supervisors, of both land use planning and provision of public services; in this sense these elements of the proposal would be consistent with objectives of the plan to combine service and land use regulations in one elected body.

- E.1.3 "The DEIR erroneously concludes that there will be no impact on two . . . policies . . . The proposed project is inconsistent with the following policies: 2e. Limit Residential Development in Rural areas . . . 8f. Promote Development of Central Areas . . . "

Response: Policy 2.e. refers to development in rural residential areas, outside municipal or community service areas. Such development would typically rely on private wells and septic tanks, rather than on existing or planned public utilities. Rural residential areas, almost all of which are existing areas of very low density residential development, are designated on the Livermore-Amador Valley Planning Unit General Plan Land Use and Circulation diagram; none are shown in the Las Positas project area.

Staff concurs that the project may not be fully consistent with Policy 8.f., which reads "to promote the development and redevelopment of the existing central areas of the three valley communities as commercial and business centers through land controls which limit the extent of commercial development in other areas, through district projects and programs, and through supportive capital improvements." The policy, of course, infers a valleywide pattern of urban development which includes only limited amounts of development in the Las Positas area, and, as such, recommends against significant amounts of commercial or business development within this designated urban area but outside of existing central commercial areas. If the County plan were to be amended to approve proposed amounts of residential development in the Las Positas area it would be appropriate to include adequate amounts of commercial/business/industrial development in order to minimize potential environmental (eg.traffic, air quality) and fiscal impacts which would result from a purely residential development. This, therefore, would warrant amendment to the subject policy.

- E.1.4 "The DEIR fails to analyze conformance of the project with the countywide general plan (Open Space Element, Conservation Element cited)

Response: The Livermore-Amador Valley Planning Unit General Plan was adopted in 1977 as the primary statement of County of Alameda General Plan policy for that Planning Unit. It was prepared and adopted as a comprehensive and self-contained statement of urban development and open space/environmental management policy for the Planning Unit. It constitutes (in policies and diagram) the County's Land Use and Circulation Elements for the Planning Unit. It also incorporates



policies from the several other elements of the County General Plan, including the Open Space and Conservation Elements. Because the Livermore-Amador Valley Planning Unit is a comprehensive plan document, we conclude that it is correct to use it as the principal document against which to measure project consistency or inconsistency with the County of Alameda General Plan.

We would also note that the policies in the Open Space Element govern the use and management of lands designated as open space in the Land Use and Circulation Element of the County General Plan. Hence, if the Land Use Diagram of the General Plan were amended to indicate urban land uses in the Las Positas area, the Open Space Element diagram would be similarly amended, and the policies of the Open Space Element would no longer directly apply to the area of Plan amendment.

#### ABAG Policies

##### E.2.0     City of Livermore, letter, received May 16, 1983

E.2.1     " . . . the DEIR should analyze and apply updated information available from ABAG concerning regional employment and housing trends. Those data should be applied to the ABAG plans and policies . . . and appropriate revisions should be made to the DEIR."

Response: ABAG's revised projections of population, housing, and employment for the PMA were not available in time to be included in the Revised Draft EIR. Projections '83 has subsequently been completed and adopted; data applicable to the current analysis of the Las Positas project are included in this FEIR.

##### E.3.0     ABAG, letter of May 16, 1983

E.3.1     " . . . we feel that the DEIR, in Section 5.3, misinterprets ABAG's long-standing policy position on new large-scale developments. The misinterpretation, in turn, results in insufficient consideration of concerns of Bay Area local elected officials embodied in the adopted Regional Plan and in Executive Board policy positions relative to development in the Livermore Amador Valley. . . .The discussion of consistency with ABAG policies on page 5-70 of the DEIR quotes the New Communities Strategy from the ABAG Regional Plan 1980, and the 1975 Executive Board policy statement on the original proposal for Las Positas. Actually, the New Communities Strategy has not been used in ABAG reviews since 1971, and was deleted from the Regional Plan when it was amended by the General

Assembly in October 1981. . . .The guiding principle in ABAG's review of development proposals is the "city-centered" approach to regional growth. The principle is embodied in the Regional Plan's Urban Development Strategy . . . additional review criteria for the Las Positas proposal have been derived from Executive Board positions on the original Las Positas project (cited in the DEIR) and on subsequent grant applications and local general plans submitted by jurisdictions in the Livermore Amador Valley.

Basically, the premises of the Regional Plan's Urban Development Strategy are that:

1. Urban growth should take place in and around existing cities in which needed facilities and services are available or committed in capital budgets;
2. Living, working and shopping in the same community should be promoted; the need for long distance commuting, with attendant highway, fuel and air pollution costs, should be reduced;
3. Housing and employment opportunities should be provided for low and moderate income persons;
4. A coordinated program of planning and action among the many public agencies and the private sector is needed to resolve subregional economic, environmental and service delivery problems.

The Las Positas proposal has serious conflicts with each of the regional positions stated above, that are not adequately discussed in the DEIR."

Response: The Final EIR is hereby corrected to indicate that the New Communities Strategy from the ABAG Regional Plan 1980 was deleted from the Regional Plan, amended in October 1981. Staff concurs that the proposed project would conflict with the some of the provisions of the Regional Plan's Urban Development Strategy:

1. The project would not be consistent with the premise that urban development take place in and around existing cities in which needed facilities and services are available or committed. . . .  
There are only limited services and facilities available to the project area; the proposal calls for establishment of a new system of infrastructure to be managed by the County through a CSA.
2. The development, as proposed, does provide for living, working and shopping within the same community. It is not expected that

employed residents would need to commute long distances to jobs; most could be expected to work either within the community or at commercial/industrial areas elsewhere in the PMA (within 15 to 30 minutes driving time).

3. While the proposal would include a good mix of housing types and densities, at the prices proposed only around seven percent of the housing would be affordable to moderate income households.

4. Such a coordinated planning and action program is deemed necessary to the successful mitigation of a number of potential impacts which would result from implementation of the Las Positas project. These programs for Las Positas, as well as mitigation programs for other major developments in the PMA could, however, fall short of a comprehensive, valleywide planning effort, involving all concerned public agencies and private interests, and which staff concludes would be most appropriate in consideration of relatively recent changes in conditions and trends, many of which were not fully anticipated in the comprehensive planning efforts undertaken during the mid and late 1970s.

#### LAFCO Policies

##### E.4.0 City of Livermore, May 16, 1983

E.4.1. "Other LAFCO policies expressed in earlier actions on Livermore's sphere of influence are highly relevant to Las Positas and should be set forth in the EIR. For example, in its 1979 decision on the Livermore sphere of influence, LAFCO stated that: "1. Further urbanization of the Livermore area should be limited to development within the Sphere of Influence. . . ; 2. Development within the Sphere of Influence should be encouraged to consolidate urbanization with mutually compatible land uses and living environments based on the City general plan; 3. Urbanization of the area outside the Sphere of Influence of the City. . . should be discouraged; 4. Establishment of Special Districts that provide service to urban developments that do not have the authority for land use planning should be discouraged." The proposed Las Positas CSA contradicts each of these policies . . . "

Response: Staff concludes that the proposed Las Positas project would not be consistent with items 1 and 3. Item 2 pertains to the desired character of development within the City sphere. Item 4 discourages use of Special Districts which do not have land use



planning authority; the current Las Positas proposal calls for the County Board of Supervisors to assume responsibility for most public services in addition to its land use planning responsibilities. Again, these provisions, as well as LAFCo priorities identified in the RDEIR, would appear to be qualified by the November, 1981 Resolution No.81-43 and by the LAFCo motion of May 21, 1981.

Williamson Act

E.5.0      Comments by the City of Livermore on the Draft Environmental Impact Report . . . received May 16, 1983.

E.5.1      (Regarding Williamson Act Contract Cancellations and Loss of Agricultural Lands) "the 'budgets' for projected farming in the area do not assume use of any of these techniques (farmers engaged in nonagricultural pursuits or occasionally selling off a small parcel of land). Income from sale of rural residential parcels from larger ownerships should be included in calculation of profitability of agricultural operations."

Response: Inclusion of income from non-agricultural pursuits as part of farm budgets would be inappropriate. Although the report of the agricultural economist suggests that some farmers may need to sell off small blocks of land to obtain a cash flow, this normally would not be permitted under Agricultural zoning. It should be noted that under Williamson Act Cancellation Provisions (effective January 1, 1982) "the uneconomic character of an existing agricultural use shall not by itself be sufficient reason for cancellation of the contract. The uneconomic character of the existing use may be considered only if there is no other reasonable or comparable agricultural use to which the land may be put." The conclusion of the agricultural economist, and of the EIR, is that current agricultural uses are economic.

E.5.2      " . . . the DEIR does not contain adequate analysis of the environmental effects of such (preserve) cancellations, particularly upon the continued viability of agricultural lands in the vicinity . . . The DEIR should analyze the viability of continued agricultural operations upon lands within the Las Positas area under . . . contract for which cancellation has not been sought by the landowners. The likely magnitude and timing of pressures for development of those lands should be specifically assessed. The same analysis should be made as to non-contracted agricultural lands within Las Positas. . . An identical analysis should be made upon agricultural and open space lands. . . in the

Livermore area for which conversion to non-agricultural and open space uses would increase as a result of the proposed contract cancellations. . . "

Response: Two principal factors will affect the economic viability of farming in the area: farming costs, including property taxes; and the amounts of productive land which are available for farming.

Cancellation of the Williamson Act contracts would result in a back-taxes fee and in increased ongoing taxes. Both of these would reduce the economic viability of farming in the area. This impact could be mitigated by postponing contract cancellations until such time as the effected properties were slated for urban development.

As noted in Section 5.1 (p. 5-27) of the Revised DEIR, most of the project area is farmed by growers who use this land in conjunction with other property in order to generate sufficient income to support their families. The loss of productive land to urban development would, therefore, adversely affect the farming incomes of these families. This impact cannot be mitigated by the County. Permanent loss of agricultural production would result if project area production is not, or cannot be relocated elsewhere. Some mitigation of project impacts on the general economic viability of farming in the area could be achieved by staging urban development such that "workable" units of farmland were retained through most of project buildout.

Assessment of the project's interim and long-term impacts on agricultural uses in the project area and the vicinity is included in Section 5.12, Land Use, of the RDEIR. The potential of the project to cause removal of adjacent lands from agricultural use is also addressed in Section 8.0, Growth Inducing Impacts. The Alternative Land Use Diagram, in Section 7.5, p.7-9, does identify adjoining lands for which pressures for conversion from agricultural to urban uses would be directly induced by the proposed project. It is beyond the scope of the current EIR to identify, on a site-specific basis, lands beyond this area of immediate growth inducing impact for which pressures for conversion would be indirectly induced by actions on the Plan amendment, rezoning, and Williamson Act contracts.

E.5.3 "The DEIR contains a cursory discussion of conformance of the petitions to cancel . . . Williams Act contracts with . . . (Government Code section 51282.1) and . . . (section 51282(a)(2)) . . . It should be noted that DEIR cannot serve as an adequate basis for assessment of conformance with these statutory standards,



since the current draft is incomplete and misleading . . . the DEIR makes almost no effort to assess conformance with the requirements of the "window" provision that any cancellation and alternatives use will not result in discontinuous patterns of urban development." . . . the City of Livermore disagrees that "existing and planned urban uses in the Livermore-Springtown area" would justify a finding of conformance with this requirement . . . Even if all Las Positas area landowners participated in the proposed phasing, the project would represent a discontinuous extension of development which available planning studies indicate would be premature."

Response: Under the current proposal of project proponents, cancellation of Williamson Act Contracts would be included among the actions required to implement the project. It is the function of the EIR to identify impacts resulting from this and other actions, which would constitute direct and indirect impacts of the project, as well as indirect, growth inducing impacts associated with the statutory actions. We do not conclude that this environmental analysis must also include a determination of the conformance of a proposed cancellation with the requirements of the Government Code. The Board of Supervisors, rather, will determine if statutory conformance is met by any petition based upon its judgment of supporting evidence submitted with that petition.

- E.5.4. ". . . the County must analyze the extent to which development of Las Positas at this time would draw development away from areas in Livermore, the Tri-Valley area, and the Bay Area region which have already been committed for development."

Response: The relationship of the project to projected population, housing, and employment growth elsewhere in the Primary Market Area is addressed in Sections 5.1 and 5.2 of the RDEIR. Although a marketability analysis would be needed to test the competitiveness of industrial, commercial and residential components of the project with other proposed development in the PMA, we do conclude that some relocation of projected development could occur. We do not, however, conclude that this would, by itself, significantly alter the pattern of urban development which is otherwise planned for the PMA.

- E.5.5 " . . . the County must assess in detail the extent of noncompliance with the window provisions arising from continued agricultural use or other nonparticipation by landowners within the general plan amendment area with the development plan."



Response: It is currently stated in the RDEIR (p. 5-72) that "it is possible that a discontinuous pattern of urban development could result if some landowners within Las Positas decide to continue agricultural use." This could be mitigated to a certain extent through provisions of the PD and Plan amendment requiring Development Agreements of all property owners in the project area, or of all owners in each phase area.

E.5.6 "The DEIR should analyze whether these cancellations would be compatible with the purposes sought to be achieved by the Williamson Act and its cancellation provisions. . . Among the Act's purposes, for instance, is "discouragement of premature and unnecessary conversion of agricultural land to urban uses". . . and avoidance of "removal of adjacent lands from agricultural use. . . "

Response: Refer to the response to Comment E.5.3, above.

E.5.7 "The DEIR undertakes no analysis of the availability of "proximate noncontracted land which is both available and suitable" for the proposed project. . . "

Response: Refer to the response to Comment E.5.3, above.

E.5.8 ". . . a general plan amendment was required to have been initiated prior to January 1, 1982, not January 1, 1981. . . "

Response: The correction is hereby noted.

F.        Recreation

F.1.0     Livermore Area Recreation and Park District, Letter of May 13, 1983

F.1.1     "The Board does not concur with the proposal that the County Service Area (CSA) have a long-term capability of providing park and recreation services and strongly recommends the project sponsor be required to delete this provision from the proposal."

Response:   The comment is acknowledged.   No further response is required.

F.1.2     "The Board does not concur with the proposal that so called "surplus property tax revenues" be directed or used to reduce certain developer costs or user fees." . . . Recommend that the project sponsor be required to revise his proposal to reflect this fact."

Response:   Refer to the response to Comment P.12.1.

F.1.3     "The District does collect user fees for program purposes and these monies are used to offset some of the costs for program activities. Such fees are not used for park maintenance purposes. The statement in the DEIR that LARPD provided \$1.00 per capita estimate is not correct . . . Recommend that the project sponsor be required to revise the revenue projections so as to bring them into line with current District practices concerning user fees."

Response:   Refer to the response to Comment P.12.2.

F.1.4     "The Board does not agree with the total revenue projections that reflect a \$13,080,000 "surplus" over the term of the project for several reasons, one of which was discussed . . . under user fees. Other reasons are as follows: . . . Only about 50% of the District's share of the . . . property tax levy goes into the Special District Augmentation Fund (SDAF) for allocation as deemed appropriate by the Board of Supervisors. The study assumes that LARPD will receive 100% of LARPD's 13.28% of property tax revenues derived from tax code area 64001. This is not factual. Actual experience over the last few years reveals that LARPD eventually receives about 90% . . . This 10% annual short-fall translates into a reduction of some \$1,100,000 in total revenue over the 20 year life of the project."

Response:   Refer to the response to Comment P.12.3.

F.1.5 "The study addresses only park maintenance costs. Not factored into the operation and maintenance costs are monies needed to operate and maintain the facilities and public buildings . . . recreation centers, tennis courts, swimming pools, ball fields, etc.)."

Response: Refer to the response to P.12.4.

F.1.6 "Also omitted are monies for personal staffing, administrative costs, equipment needs and supplies and the monies needed to provide program activities for the estimated 45,000 residents."

Response: Refer to the response to P.12.5.

F.1.7 "The Board . . . recommends that the project sponsor . . . address the revenue and cost projections as they relate to the provision of park and recreation services so as to reflect all facets . . . not just park maintenance costs."

Response: Refer to the response to P.12.6.



G.        Police Protection

G.1.0     Sheriff's Department, County of Alameda, R.F. Souza, Chief Criminal Division

- G.1.1     "It is estimated that the badge personnel complement requires a 30% support staff. Given 88 badge positions then a support staff of 27 would be appropriate. It is not possible, at this time, to develop the actual configuration but the following position designations are deemed appropriate: records supervisors, dispatch supervisors, records clerk, warrant clerk, data input clerk, dispatcher, etc."

Response: The clarification is noted and descriptive materials are revised accordingly. Sheriff protection costs were estimated on a per capita basis, i.e., at the same level of service as provided to other unincorporated areas of the County. Costs were estimated in two categories: (1) unincorporated services (at \$54.36 per capita) and (2) general government (which includes sheriff administration, County-wide services and civil division at \$10.62 per capita). Support staff are already factored in; to the estimate of costs.

- G.1.2     "There are two county-wide criminal justice services that are impacted by Las Positas. They are: (a) Alameda County Crime Laboratory . . . Las Positas is anticipated to require an additional Criminalist and supporting analytical equipment. In addition, due to its distance from the central facility an additional vehicle, vehicle equipment, and office space will be required. (b) General Identification Bureau . . . Las Positas will mandate two additional personnel; they are the Latent Fingerprint Specialist and a Fingerprint Technician."

Response: Criminal justice services are also estimated on a per capita basis. The additional fingerprint specialists, criminalist, office space and vehicle are factored into this analysis.

H. Schools

H.1.0 Betty Carrell, President, Board of Education, Livermore Valley Joint Unified School District, letter of April 22, 1983.

H.1.1 "It is still the position of the Board of Education that there must be a guarantee prior to any approval of the Las Positas development, that adequate school facilities will be available when and where they are needed. The Board must be assured the construction of new schools in the development is accomplished in a manner that will avoid the overcrowding of existing schools and the potential reduction of the quality of education that overcrowding can cause . . . the revised DEIR does not provide these guarantees and assurances. Three alternate means of financing new school construction are mentioned in the DEIR, none of which assures the District of the timeliness of construction (: ) 1) Developer fees; by the time enough fees have accumulated to even start construction of a school, the project will be close to the end of Phase I. This will inevitably result in the overcrowding of existing schools . . . 2) State Building Fund . . . is not a reliable means . . . since the demand for these funds may exceed their availability . . . (and) . . . there is no assurance the Livermore School District will have high enough priority to receive any of the available funds . . . 3) Special Assessment District/Community Facilities District . . . The Board agrees that these funding measures are not reliable."

Response: Refer to the response to Comment P.1.1.

H.1.2 "The surest way of providing schools . . . is for the sponsor to advance fees sufficient to construct all Phase I schools."

Response: Refer to the response to comment P.1.2.

H.1.3 "Mitigation of the Board's concerns . . . should be a condition of approval of the sponsor's application for General Plan Amendment. Furthermore, to ensure these conditions remain binding, it is proposed that an agreement be entered into between the County . . . and the . . . School district to the effect that no unilateral action will be taken in the future to alter or waive these conditions . . . "

Response: The General Plan amendment and the rezoning would establish basic objectives and requirements for implementing the project and for mitigating impacts, including impacts on the School District. An agreement, such as that proposed, can be specified in the conditions and provisions of the rezoning, to be formally

entered into prior to any development in the project area.

H.2.0      Susan Steinberg, Chairman, Livermore Committee for Quality Education, address to Planning Commission, April 25, 1983.

H.2.1      " . . . The Livermore School District simply cannot be forced by the county to provide for the proposed new development in Las Positas Valley which would not be under legal obligation to make any financial commitment or property donation to the School District, as city development must do."

Response:   The comment is acknowledged. Refer to responses to the Livermore Valley Unified School District comments P.1.1 through P.1.3.

H.2.2      "There has been no offer of legal commitment to the (School) District to ensure that the extensive buildings, staff, and educational materials and services needed for the residents of this development will be paid for out of funds generated by the project, or offered by the developer."

Response:   We agree. Refer to responses to comments by the Livermore Valley Unified School District, P.1.1 through P.1.3.



I. Water Supply

I.1.0 East Bay Regional Park District, T.H. Lindenmeyer, Environmental Coordinator, Planning and Design, Letter of May 9, 1983

I.1.1 "The discussion of the impacts of the project upon groundwater levels . . . is incomplete because it does not consider what would occur to the groundwater levels in the Central Livermore Basin. Since it is clear from Table 5.27b that demand will exceed water supplies, it is therefore obvious that the result will be an overdraft of the groundwater in that basin. The ultimate result of a chronic overdraft in that water basin upon EBRPD."

Response: This and other similar questions regarding potential project impacts on Valley groundwater resources were referred for comment to Zone 7, Alameda County Flood Control and Water Conservation District. Their July 19, 1983 letter is included as an Appendix to this FEIR. In it they note that, based on considerations of past fluctuations in groundwater levels and the effects on Shadow Cliffs, they do not see any significant impacts on Shadow Cliffs in the future. " While the current concern expressed by EBRPD is that water levels may be too high, (Zone 7 staff indicate that) in the past the level in Shadow Cliffs was such that make-up water was needed and untreated water was made available to them." District staff maintain that "to keep a "swimming pool" condition it would have to be managed - which the park district has been successfully doing."

I.2.0 ACFCWCD Zone 7, letter of May 13, 1983

I.2.1 "Expansion of water treatment and storage facilities will be needed earlier than planned and prepayment of Zone 7 water connection fees may have to be made to provide the financial resources required for such water facilities."

Response: This is consistent with the current finding in the Revised DEIR (p.5-99).

I.2.2 "Water supply from the State Water Project will continue to be questionable but initial estimates of shortfalls of water supply can be met with groundwater supplies pumped by the Zone in "critical" and "dry years".

Response: The comment is noted. Further clarification is provided in the Zone's letter of July 19, 1983, included as an Appendix to this FEIR.

District staff's current assessment of water supply and demand is that "under projected normal demand conditions the expected average import supply for the most part should be adequate. If less than average supply were available, then the normal demand would have to conform to available supply or the import supply would have to be augmented by groundwater supplies. Such withdrawals would not be expected to be required year in and year out. If withdrawals are made, it can be expected that it will be made up or replenished by groundwater recharge in wetter years.

"One consideration that may have a significant effect on demand is water conservation. Under dry year or even critical year water supply conditions water conservation will result in demand reductions. Agricultural demand on the import supply may be curtailed, or the user may elect to not use the supply because of water quality considerations. Thus, such supply would be available for municipal purposes.

"Since most major development projects are staged, updated water supply and demand assessments should be considered anew at each stage to ensure that any potential problems can be resolved in advance before proceeding with the next step."

Planning Department staff have compared DWR and Zone 7 projections of water demand in the Livermore-Amador Valley to its own estimates of future demand based on ABAG's projections of population and housing through 2000, and the Department extrapolations of these through 2010).

Table 5.27a, page 5-90, of the RDEIR reflect Department of Water Resources and Zone 7 assumptions regarding future urban, agricultural, and quarries demand. Table 5.27a.1 includes ACPD's adjustment of urban and total demand based on the ABAG projections and ACPD extrapolation of population growth through 2010.

The ACPD estimate of urban water demand is comparable, although slightly higher than the DWR projection. In the revised projections, without Las Positas, net deficits occur only in critical water supply years (200 acre feet in 1990, 1,200 acre feet in 2000, and 4,000 acre feet in 2010). When demand from Las Positas is added, these critical year deficits increase to 2,700 acre feet in 1990, 7,700 acre feet in 2000, and 12,500 acre feet in 2010. Net deficits are also estimated for "dry" year supply conditions (net deficits of 700, 1,600, and 6,400 acre feet in 1990, 2000, and 2010, respectively). During "average" water supply

years, a relatively small deficit, of 1,800 acre feet per year, would not occur until after year 2000. 27c). Water conservation, applied throughout the Valley, would totally eliminate the projected deficits under average supply conditions. Assumed amounts of water conservation would probably not be adequate during critical and dry supply years. As suggested by Zone 7, additional conservation measures, reductions in agricultural deliveries, and groundwater pumping could be implemented to achieve a balance between supplies and demand during these years.

Table 5.27a.1  
 Estimated Water Demand  
 in the Livermore-Amador Valley  
 (1,000s of acre feet per year)

	1980	1990	2000	2010
Urban				
DWR Estimate	18.6	22.4	25.9	27.5
Zone 7 Estimate	19.7	26.6	31.0	34.5
ACPD Estimate	17.6	22.6	26.4	29.2
Agricultural				
DWR Estimate	11.8	11.3	11.3	11.3
Zone 7 Estimate	3.8	5.5	7.5	7.5
Quarries	8.0	8.0	8.0	8.0
Totals				
DWR Estimate	38.4	41.7	45.2	46.7
Zone 7 Estimate	31.5	40.1	46.5	50.0
ACPD Estimate	29.4	36.1	41.9	44.7

Sources: See Table 5.27a,p.5-90 for DWR and Zone 7 sources. ACPD water demand for years 1980 and 1990 are based on ABAG Projections 83 population data for Livermore, Pleasanton and Dublin. Year 2010 was extrapolated by ACPD. Per capita consumption is assumed to be: 153 gpd/capita in Livermore; 171 gpd/capita in Pleasanton; and 161 gpd/capita in Dublin. ACPD totals include ACPD estimates of urban demand plus Zone 7 estimates of Agricultural and Quarries demand.



I.3.0      City of Livermore, letter of May 16, 1983.

I.3.1      "The DEIR analysis of water demand and supply . . . underestimates the projected demand for water . . . (The estimate of project demand) includes only residential demand, not industrial, commercial, and fire flow demand. To obtain accurate estimates of total water demand for the project, the DEIR must include commercial, industrial and fire flow demand as well."

Response: The "per capita" rates used in the Revised DEIR (and which were also used by the Department of Water Resources and Zone 7 in the cited reports - Recommended Water Management Plan for Alameda County Flood Control and Water Conservation District, Zone 7, DWR, November, 1982; and Bulletin 166-3, Urban Water Use, DWR, Preliminary Data) are expressions of community water consumption for mixes of urban uses, including industrial, commercial and institutional as well as residential uses. The assumed per capita rate for Las Positas, expressed in the RDEIR as a range of 145 to 176 gallons per capita per day, yields an annual demand for between 7,500 and 9,000 acre feet. If use-specific rates of consumption are used, as follows, estimated project annual demand would range from 5,200 to 7,500 acre feet:

<u>Residential:</u> 86 gallons per capita per day x	
45,000 population	3.87 mgd
<u>Commercial:</u> 35 gallons per employee per day x	
2060 employees	0.07 mgd
<u>Office:</u> 25 gallons per employee per day x	
800 employees	0.02 mgd
<u>Industrial:</u> 35 to 160 gallons per employee	
per day x 16,900 employees	0.59
	to 2.70 mgd
<u>Schools:</u>	
<u>Elementary:</u> 4 gallons per student per day x	
5400 students	0.02 mgd
<u>Secondary:</u> 8 gallons per student per day x	
6,300 students	0.05 mgd
<u>Other Institutional:</u> Say 35 gallons per	
employee per day x appx. 500 employees	0.02 mgd
<u>TOTAL</u>	4.64-6.75 mgd
	or
	5,200 -7,500 acre
	feet per year

I.3.2 "... the DEIR's treatment of the impacts of water supply deficits and mitigation measures for those impacts is misleading and inadequate . . . There is no complete listing of environmental effects followed by mitigation measures addressed to specific impacts . . . Impacts and mitigation are lumped together in sections separated from . . . discussion of . . . water aspects of the project and setting."

Response: The issue of water supply and demand, and potential impacts the groundwater basin has been referred to staff of Zone 7, Alameda County Flood Control and Water Conservation District for comment. Staff has also reviewed projections of potable water demand in the Livermore-Amador Valley in relation to the recently released ABAG projections of population and employment.

The following is extracted from Zone 7's letter of July 19, 1983 which is included as an appendix to their FEIR:

"(Regarding questions related to the groundwater basin, District staff) do not envision (the) groundwater basin to be subjected to an overdraft (long-term deficiency) condition unless an uncontrollable sustained withdrawal were to occur. The Zone's groundwater replenishment program over the last twenty years has "banked" a significant volume of water which could be relied upon during water supply short periods. This "filling" has brought the water level up in the Livermore area about 70 feet. This same rise is also indicated in the Pleasanton area. Even if the basin's level were to be lowered by pumping to its former low, the impacts would probably not be significant, particularly when you consider the offsetting benefits and the fact that water supply conditions would eventually become more favorable to permit a refilling."

I.3.3 "The DEIR should discuss the potential impacts of the SWP deficit, which might include cutbacks in supplies and over-drawing from the Central Valley Basin and other impacts."

Response: Refer to the response to Comment I.3.1, above.

I.3.4 "... The DEIR's proposed "mitigation" measures serve only to obscure the unavoidable impacts associated with SWP deficits. Two "mitigation" measures (are given) on p. 5-97 . . . Delay does not qualify as a mitigation measure . . . "

" . . . the DEIR's listing of unavoidable adverse impacts is incomplete and misleading . . . For example, no unavoidable adverse impacts are noted with respect to water supply. yet, clearly the

very real possibility that no additional SWP facilities will be constructed . . . would generate substantial unmitigable impacts. Delay in approval of the Las Positas project . . . cannot be considered a mitigation measure."

Response: Impacts on local groundwater resources alluded to in the comment would occur only if the state did not provide Zone 7 with all or part of the contracted-for entitlement. Given the uncertainties regarding the timing and the quantity of future SWP supplies to Zone 7, the RDEIR has treated two scenarios in its discussions of the Las Positas project's impacts on water supply and demand relationships. With full SWP entitlements to Zone 7 the available water supply would be more than sufficient to accomodate the additional demand from Las Positas. This could be considered a "best case" scenario. Without any additional SWP facilities the RDEIR concluded that total demand in the service area, including Las Positas, would exceed projected demand in critical, dry, and average water supply years (RDEIR, p.5-95). For purposes of the RDEIR, this was considered the "worst case" scenario.

We do not agree that estimated "deficits" projected under the "worst case" scenario of water supply can legitimately be considered a real unavoidable impact. From the Planning Department's discussions with the staffs of Zone 7 and the State Department of Water Resources we do not conclude that the state will not identify approaches to develop all or part of the necessary supplies to meet its legal obligations in water supply contracts to the 30 or so water contractors which it serves. What appears to be certain, and what is stated in the RDEIR, is "a further delay in firming the supply will nevertheless result, and such delay will likely be two or more years" (Zone 7, letter of August 6, 1982)."

We further conclude, consistent with the expressed position of Zone 7 staff, that future "net deficits" with the addition of Las Positas demand, and without any additional SWP facilities could be effectively managed without prolonged use of local groundwater resources. The revised projections of demand with Las Positas continue to show "net deficits" during critical and dry years through year 2000, and for all conditions after year 2000. However, with application of water conservation measures, recommended by DWR, throughout the Livermore-Amador Valley, the long-term "deficits", and hence the need to draw upon the local groundwater basin, are reduced considerably in both dry and critical supply years, and are eliminated entirely during average supply years.



We agree that postponement, or delay of project construction for an indefinite period would not in itself mitigate potential water supply deficits if it were clearly evident that the state would not develop any additional supplies. This, however, is not what is specifically proposed. Rather, it is recommended that either 1) actions on the Plan amendment and rezoning be delayed, or 2) any implementing actions on the Plan amendment and zoning reclassification be deferred until it is positively determined that an adequate water supply can be assured to the project with no reductions in future required deliveries to retail contractors in the Valley, and consistent with Zone 7 objectives regarding the use of both imported and groundwater sources." In effect, the project could not proceed if an adequate water supply cannot be guaranteed.

I.4.0      ABAG, letter of May 16, 1983

I.4.1      "Since an adequate supply of water is crucial to the economic viability of this project, it is recommended that either (a) a firm commitment to an adequate water supply be secured before proceeding with this project, or (b) the FEIR include a Phase I development plan that is economically feasible, based only on the currently available water supply."

Response:    The comment is acknowledged. Requiring a firm commitment to an adequate water supply prior to any actions to implement the Plan amendment and rezoning is currently recommended by Planning Department staff. Each phase of the project should be economically feasible.

J. Wastewater and Groundwater Management

J.1.0 Arthur Futch, Livermore-Amador Valley Conservation Group of the Bay Area Sierra Club, address to Planning Commission, April 25, 1983

J.1.1 "Until the hydrology of this mitigation is understood, export (sewage) effluent to San Francisco Bay should be required.

Response: The comment is acknowledged.

J.2.0 San Francisco Bay Regional Water Quality Control Board, Memorandum of May 3, 1983

J.2.1 "Export of wastewater is still the most desirable disposal option. For this project export should be considered as a potential disposal alternative."

Response: Use of an export pipeline is addressed as a disposal alternative in the discussion of wastewater management for the project (p.5-101), where it was noted that preliminary cost comparisons for a pipeline versus demineralization appear to favor export.

J.2.2 "Table 2.1 indicates that 170 acres of land would be needed for wastewater treatment, but Table 5.30 indicates that only 20 acres would be needed. Why is there a difference?"

Response: Table 5.30 only includes the estimated acreage for the wastewater treatment plant. Table 2.1 was developed by Wilsey & Ham, who, in response to the question, indicate that the 170 acres noted in Table 2.1 includes areas for the wastewater treatment plant, ground water treatment plant, several storage ponds, and brine evaporation ponds that will be necessary during the first phase of the project. This has not been confirmed.

As indicated in Section 5.6 of the RDEIR, land components of the proposed wastewater treatment and disposal system would include: 1) the site of the wastewater treatment plant; 2) landscaped open space within and adjoining the proposed area of urbanization for irrigation disposal of treated wastewaters; 3) ponds for the evaporation of brines; 4) ponds for seasonal storage of treated wastewaters; and 5) sites for the proposed groundwater treatment plant and brine evaporation pond:

1. Approximately 20 acres of relatively flat area would be needed for the 5.0 mgd secondary and advanced treatment plant. This is indicated in Table 5.30, page 5-116.

2. Approximately 200 acres of land would be needed for brine evaporation ponds.
3. Approximately 1,470 acres of landscaped open space would be needed for irrigation with reclaimed water; project consultants indicate that the project would include approximately 1,600 acres for this purpose, including 865 acres of parks and open space, 315 acres of public and institutional landscaped area, 167 acres within detached residential areas, 81 acres within multifamily areas, 10 areas within commercial areas, 136 acres within employment areas and 26 acres along arterial routes.
4. A required volume of between 1,260 and 1,941 acre-feet would be needed for inclement weather reclaimed water storage; the actual area required for the storage facilities would depend on their configurations; project consultants indicate that these facilities would typically be located within proposed open space areas.
5. The proposed groundwater management system would require approximately 30 to 55 acres for the treatment plant and brine evaporation ponds.

J.2.3 "On page 5-115 it states that 1470 acres of land will be used for wastewater disposal, and it identifies 1600 specific acres of land to be used for this. The vast majority of this land is made up of 865 acres of parks and open space and 315 acres of public institutional lands. We question the validity of both of these figures. The second figure implies that 315 out of 420 acres of public and institutional lands would be irrigated. One hundred out of the 420 acres would seem to be a better estimate."

Response: The project Land Use and Open Space diagrams do not specifically (graphically) locate all acreage proposed or needed for wastewater disposal. The issue raised by the District is legitimate and points to two possible approaches to ensure that adequate irrigation area will be available:

First, project consultants have noted that a contingency disposal area of 135 acres would also be available for irrigation. This is a hill area to the northwest of the project area identified as Contingency Disposal Area on Figure 2.6, Major Wastewater Treatment and Collection System. The area is within the noticed area of Plan amendment and rezoning and is controlled by the project sponsors (Las Positas Land Company). Project consultants note that other areas outside the project urban development area could also be used for irrigation purposes; these include portions of parcel 99B-4500-4, located to the north, and of parcel



99B-4200-4-8, located to the east of the proposed urban development area. Neither of these properties are controlled by the project sponsors, and no monies have been budgeted for their acquisition as public wastewater disposal areas.

Second, the proposed land use and open space diagrams could be modified, and/or actions on the Plan amendment and rezoning conditioned to ensure that adequate landscaped land area would be available for wastewater disposal.

- J.2.4 "The off-site contingency disposal area is still only mentioned in vague terms. This area should be clearly identified and the basis for its use specified."

Response: The proposed off-site contingency disposal area is designated on Figure 2.6.

- J.2.5 "Since the on-site disposal area is apparently designed for average conditions, the off-site area will presumably be used every other year, on the average."

Response: Project engineering consultants indicate that the phrase "on the average" means during seasons with average rainfall.

- J.2.6 "The concept of the groundwater control proposal appears reasonable, but more details need to be specified before the Regional Board could totally accept it. In particular, a complete water balance for the area should be developed, including the contribution of the upstream hill areas."

Response: The consultant indicates that only groundwater drainage quantities under present and future project operating conditions are needed to anticipate groundwater control requirements. These quantities can be reasonably estimated without deriving a complete water balance analysis for the area, and were previously calculated in preliminary project studies.

- J.3.0 John Stein, Councilmember, City of Livermore, letter of May 6, 1983

- J.3.1 "The new DEIR shows a cost for the sewage treatment plant and ponds of \$36,594,000 . . . versus \$43,222,000 in the old DEIR . . . Also the land cost or effluent disposal was reduced from \$6,350,000 to \$5,850,000. On what basis were these new lower costs arrived at and by whom? Is there a new report by Lowry and Associates?"

Response: The difference in estimated costs for the sewage treatment plant result primarily from differences in itemization. According to Wilsey & Ham, the \$43,222,000 estimate on page 5-136 of the June 1982 DEIR included \$7,070,000 for spray disposal piping, seasonal storage and evaporation storage. These costs were added, by Wilsey & Ham, to the Lowry & Associates estimate of \$36,152,000 included in their draft conceptual report of February, 1982.

The Revised March 1983 DEIR utilized Lowry's estimate of \$36,595,000. Cost estimates shown on page 5-149 of the Revised DEIR add the costs for spray disposal piping and storage separately. Costs for land for the treated water system are added to the Lowry plant estimates.

J.4.0 East Bay Regional Park District, letter of May 9, 1983

J.4.1 "The enumeration of . . . potential adverse impacts of groundwater discharge into the surface water system . . . is incomplete in that it fails to note the possibility of adverse impacts upon the quality of the water in the ponds of Alameda Creek Quarries Regional Recreation Area in Fremont."

Response: The impacts of proposed treated effluent irrigation disposal for Las Positas which might occur beyond the local groundwater basin are discussed in Section 4.4, pages 4-39 and 4-40, of the Revised DEIR. In Section 4 a program for collection and demineralization of area groundwater to prevent unwanted downstream release of project drainage is identified as mitigation of these potential off site impacts. This Section is hereby corrected to note that such a groundwater management program is, in fact, a component of the project proposal, as is currently indicated in Section 5.6, page 5-117. of the RDEIR.

J.4.2 "The consultant's recommended mitigation measure to pump the low-quality groundwater to the surface, treat it and discharge it into the surface water system probably would not work unless the entire Las Positas Valley were underlain by a tile drain field. Such a facility would be extremely expensive, and its costs have not been included in the fiscal impact evaluation."

Response: Collection of groundwater is required (1) to intercept groundwater before it leaves the Las Positas basin, and (2) to manage areas of existing high ground water levels so that construction can occur. Groundwater within the Las Positas Valley

flows generally from north to south. The proposed groundwater collection system is planned for the southern third of the project area where there currently exists high groundwater levels. Project engineering consultants indicate that an underground collection system covering the entire project area would not be necessary to ensure that groundwater does not leave the Valley. The costs of this collection system have been included in the fiscal impact analysis, as have costs for treating the collected groundwater.

- J.4.3 "Regardless of whether the groundwater is collected and treated, or simply allowed to flow naturally from the subsurface to the surface drainage system, the sewage from the project would constitute a significant component of the "groundwater." Thus, the project has an elaborately disguised surface-water discharge sewage treatment system with serious implications upon the quality of the receiving waters and its users . . . "

Response: As proposed, both wastewater and groundwater would be treated sufficiently to meet Zone 7 requirements.

- J.5.0 Alameda County Flood Control and Water Conservation District, Zone 7, letter of May 13, 1983.

- J.5.1 "While the report deals with on-site treatment and reuse of wastewater, there is little indication that the developer is receptive to export rather than reuse . . . While the Zone is exploring an acceptable export solution, potential developers and municipalities with a stake in the result should be underwriting some of these costs . . . "

Response: The Las Positas Land Company has indicated that they support the concept of wastewater export and have indicated a willingness to participate with municipalities and other interested parties in pursuing an export alternative. Actions on the Plan amendment and rezoning may be conditioned to require project sponsors and developers to underwrite some of the costs for export studies, and to establish export (or any other approved regional solution) as the required means for project wastewater disposal.

- J.5.2 "The proposed plan to handle rising groundwater, needs more development to show that the proposal will work. Data on the subsurface conditions need to be collected before the proposed system could be planned and evaluated.



Response: These would treat problems of high groundwater levels, only, if export of project wastewater is required.

J.5.3 "One MGD of dewatering and treatment may not be adequate particularly when you consider that outdoor urban uses in addition to reuse of the treated wastewater will add to the rising groundwater problem."

Response: Outdoor urban irrigation under full development has been included in revised estimates of groundwater quantities summarized below:

Las Positas Groundwater Drainage  
Requirements

Cumulative Quantities	1985-90	1990-95	1995-2000	2000-05
in Acre-feet	395	535	675	830
in gpd	352,000	478,000	603,000	741,000

source: William C. Ellis

Conditions and Assumptions

1. The assumption basic to the entire analysis is that the lower part of the project area, containing very tight soils and a high water table, can be effectively drained to control the groundwater table at suitable depths, say, to at least 6 feet below ground surface.
2. Requirements listed above related to the high water table comprising about 950 acres in the southerly part of the project area.
3. All estimated residential irrigation contribution is included, although some is already included in project disposal irrigation figures; no industrial or public irrigation is included since it is largely, if not totally, included in project irrigation figures. Residential irrigation area and buildup are based on EIR data.
4. Project irrigation of parks, etc. is assumed to build up over an initial 10-year period of the project.
5. In addition to the annual drainage quantities given above, there would be an initial one-time removal of groundwater presently in storage, estimated at 325 a.f.

- J.5.4 "While treatment by activated carbon is not expected, it should be costed so that an upper cost level could be known."

Response: The consultants note that if activated carbon treatment were required, its primary purpose would be to provide additional assurance that any groundwater which could possibly enter into potable supplies would be free of trace organic materials. Since the most likely water to reach potable supplies would be from the groundwater treatment system, the costs for granular activated carbon treatment are added to the proposed groundwater treatment system. Costs estimates are provided for "Option 1", which represented worst case cost assumptions used in the Revised DEIR.

- J.6.0 Alameda County Water District, letter of May 12, 1983

- J.6.1 "The . . . District is concerned with the wastewater system and groundwater effects of the proposed project. The measures in the report for allaying these concerns appear on paper to be adequate; however, we are fearful that the future reality with the large expenses involved will be a different matter."

Response: The comment is acknowledged.

- J.7.0 Wilsey and Ham, letter of May 13, 1983

- 7.1 "Please include in the land area identified for irrigation the 135 acres shown on Figure 2.6 as a contingency disposal area. In addition, note that additional areas outside the proposed project development area could also be used for irrigation purposes: portions of parcel 99B-4500-4 and 99B-4200-4-8 as shown on Figure 5.17. Furthermore, the typical storage ponds, as shown on Figure 2.7 could also be used for irrigation during the dry seasons as the ponds would only be filled during the wet season when irrigation would not be possible."

Response: The 135 acres are, as indicated, currently identified in Figure 2.6. We understand that parcels 99B-4500-4 and 99B-4200-4-8, while in the noticed area of Plan amendment and rezoning consideration, are not controlled by the project sponsor; if used as irrigation contingency areas, special arrangements for their acquisition or use may be required.

- J.8.0 City of Livermore, letter of May 16, 1983

- J.8.1 "The greatest deficiency in the DEIR's discussion of the impacts

associated with wastewater generation and treatment is its use of a number of unsupported assumptions. Because there are insufficient grounds on which to make such assumptions the DEIR should analyze the range of impacts which could result in the absence of these assumptions, and should discuss measures to mitigate these impacts. It is insufficient to simply presume that everything will work as planned when there remain so many open questions which could affect the outcome . . . . Rather than analyzing hydrologic conditions and wastewater impacts, the DEIR simply states . . . that "field studies are needed to verify actual groundwater system behavior and to provide a detailed basis for assessing potential groundwater impacts of wastewater application." (DEIR, p.4-41) . . . Elsewhere . . . the DEIR lists nine field studies . . . proposed to be carried out as part of the project, not as mitigation measures. These studies could invalidate a number of assumptions made in the DEIR and could have important ramifications for a wide range of impacts. . . Instead of analyzing a range of potential impacts which takes into account the possible outcome of these necessary field studies, the DEIR simply ignores such impacts.

Response: The reliability of the proposed reverse osmosis system is discussed in Section 5.5, pages 5-111 through 5-113. Further discussion of system feasibility and reliability is provided on pages 5-118 through 5-120 of the Revised DEIR. Analysis of hydrologic conditions and of project wastewater management impacts is included in Section 4.4 of the RDEIR.

The citation "field studies are needed to verify actual groundwater system behavior and to provide a detailed basis for assessing potential groundwater impacts of wastewater application" follows a discussion of potential off-site groundwater aquifer permeability impacts. These additional studies of hydrologic relationships between the Las Positas area and downstream groundwater basins would be necessary if lateral subsurface migration and/or seepage into surface drainageways of ambient, poor quality groundwater were not controlled. However, project area groundwater management (collection and demineralization of Las Positas area groundwater) has been added as a component of the project proposal (it is incorrectly treated as mitigation in Section 4.4), in order to prevent this unwanted downstream release of project drainage.

The series of additional studies, outlined on page 4-43 of the RDEIR, would be needed to provide the necessary data for the design of the on-site groundwater management system.



- J.8.3 " . . . no supporting facts or analysis is provided to ensure that the (groundwater management) program can succeed . . . More information must be provided to verify the effectiveness and reliability of the program."

Response: The groundwater consultant determined preliminary groundwater drainage requirements as a basis for project drainage cost estimates. These estimates of required drainage amounts were made prior to further groundwater studies and must, therefore, be considered very preliminary and subject to change, both with additional groundwater information and with more detailed analysis of project irrigation operations and soil leaching factors.

- J.8.4 " . . . because the proposed reverse osmosis system is an innovative technology which has never been used full-time on the same scale as proposed in Las Positas, the DEIR should fully analyze the problem of improper functioning . . . The DEIR should analyze the frequency with which parts or all of the system are expected to break down, the resulting impacts should the system fail to function properly . . . and measures to mitigate or avoid these impacts."

Response: These issues are currently addressed in Section 5.5 of the RDEIR, pages 5-111 through 5-113.

Lowry & Associates also submit the following additional information regarding reverse osmosis systems in use elsewhere in California:

"Reverse osmosis technology has been used on a full-time basis since 1975 at a wastewater reclamation plant at the San Diego Country Estates development. This plant is operated by Ramona Municipal Water District and has a capacity of 0.25 MGD. Also, a much larger reverse osmosis system has been operated by the Orange County Water District for the past seven years at Water Factory 21. This reverse osmosis system has a capacity of 5 MGD.

"Wastewater from the San Diego Country Estates development attains secondary treatment through an extended aeration process. About one third of the secondary effluent is sent through reverse osmosis treatment. Upon treatment, this demineralized effluent is discharged to the balance of the secondary effluent, with ultimate disposal presently through spray irrigation to native vegetation.

"The plant consists of four reverse osmosis units that can be

operated independently or in conjunction as maintenance to certain units is required, or if a unit should fail. The primary problem that has been encountered at this plant is organic solids overflow from the clarifier to the reverse osmosis unit causing fouling of the membranes within the unit. However, through the built-in redundancy of four reverse osmosis units, the plant has been able to consistently meet its discharge requirements. It should be noted that the reverse osmosis system proposed for Las Positas would not have such a solids buildup problem. This is due to the fact that the influent sources for Option 1 of the proposed system will be groundwater and a higher pretreated wastewater. Groundwater typically is virtually free of suspended organic solids and the higher level of pretreatment for the wastewater would insure that solids do not reach the reverse osmosis membrane.

" . . . The largest and most successful application of reverse osmosis technology is at WF-21. This plant consists of a 15 MGD advanced treatment with 5 MGD passing through a reverse osmosis system. WF-21 was originally planned as a water treatment plant for groundwater. Highly treated wastewater is injected into the underlying groundwater basin to create a seawater intrusion barrier. Since WF-21 effluent is intended for groundwater recharge, 100 percent operation is unnecessary. WF-21 receives wastewater from an adjacent secondary wastewater plant at OCWD's discretion. Wastewater not taken by WF-21 is disposed into the ocean via an outfall. However, when operating, it must continuously meet discharge requirements. Discussion with OCWD's chief engineer suggests that down time could be reduced substantially if the plant were designed to operate continuously.

"Direct contact with OCWD personnel in charge of WF-21 has not resulted in any information which would impugn the reliability of the reverse osmosis system at the plant. It should be understood that WF-21 is not a demonstration project for reverse osmosis per se. Its objective is to demonstrate various advanced waste treatment methodologies to produce reclaimed water acceptable to the State Department of Health Services for direct recharge of a ground water basin used for municipal supply. Approximately one-third of the plant's flow is demineralized by means of reverse osmosis. Problems with excessive membrane fouling were encountered and have been resolved. Operation of the reverse osmosis system and its associated advance waste treatment components is providing valuable information which can be used in design of future facilities for demineralizing secondary effluent."

" . . . alternatives to the proposed wastewater treatment plan are



not adequately analyzed . . . In particular, the alternatives of export pipeline, groundwater recharge, direct stream discharge, and evapotranspiration all require analysis, yet are glossed over in the DEIR. The export pipeline, acknowledged in the DEIR as the preferable alternative, apparently is not analyzed because of the complexities involved in pursuing it, including the possibility that the East Bay Discharge Authority might reject it. The Authority's recent endorsement of the export pipeline further underscores the importance of analyzing this alternative.

Response: Additional discussion of these alternatives, including an additional export pipeline is provided in the report "Conceptual Wastewater Plan for Las Positas Development, Alameda County, California," prepared for Las Positas Land Company by Lowry & Associates, February 1982. This background report is included by reference in the current EIR. The referenced report was summarized in the EIR to avoid making the document too cumbersome.

Zone 7, in their letter of July 19, 1983 state that while they "are making progress in firming an export alternative the institutional agreement for continued planning and development of a project that would serve the whole valley is undecided. As you know, our consultant had suggested over a year ago an integrated approach to planning and implementation of a plan, but it was not well received except that recently there appears to be some support, or advocacy of such an approach, by the Dublin San Ramon Services District Board of Directors."

J.9.0      County of Alameda Public Works Agency, H.A. Flertzheim, Jr., letter of May 17, 1983

J.9.1      "The project proposes use of tertiary treated wastewater for irrigation purposes . . . (a)What is the cost monthly for maintenance, operation, and capital for each dwelling unit using this treatment? (b)Where else has this type of plant of this size been successfully used and what are its cost breakdowns per dwelling unit?

Response: (a) The following Table J.9.1a presents a summary of the estimated montly costs per dwelling unit for treatment. The costs are presented for both wastewater treatment (Option 1) and groundwater treatment (Option 1) by project development phases (in the Table, the first of these is divided into two sub-phases). In addition, an estimate of the total cost of wastewater and groundwater treatment is presented. This estimate, by Lowry & Associates, assumes that Phases I and II of groundwater treatment would be completed with Phases 2 and 4, respectively, of wastewater treatment.



(b) Successful operation of reverse osmosis treatment systems has occurred at factories operated by the Ramona Municipal Water District and Orange County Water District. Lowry & Associates have made an estimate of 1982 adjusted capital cost for WF-21 based on materials obtained from OCWD (Table J.9.1b). A rough comparison can be made of the operation and maintenance costs per million gallons (MG) for WF-21 and the Las Positas system. OCWD projected costs for fully operating facility are \$816 for operation and maintenance. The annual operation and maintenance cost for Phase IV of the Las Positas wastewater treatment and groundwater treatment plants would be \$1,932 per MG. Lowry & Associates note that this value is well above the value for WF-21. However, the proposed Las Positas system would not be exactly the same as WF-21 and the consultants advise that a direct comparison is not appropriate. They maintain that the estimated operation and maintenance cost per MG for the Las Positas system appears to be a very conservative estimate.

Lowry & Associates indicate that another rough comparison can be made between the present user charges levied by the Ramona Municipal Water District against residents within San Diego Country Estates and that estimated for Las Positas. Again, the reverse osmosis treatment plant for the estates has a capacity of 0.25 MGD. This can roughly be compared to the estimated user charge for the first stages of Phase I in Las Positas, which would have a capacity of 0.5 MGD, relatively close in capacity size to the RMWD plant. RMWD levies a charge of \$15.00 per month per dwelling unit for residences. Under the first stage of Phase I of the Las Positas system, the estimated user charge is \$46.07 per month per dwelling unit. These costs cannot be directly compared since the actual facilities would differ.

Table J.9.1a (New)

LAS POSITAS  
 ESTIMATED USER FEES BY PHASE  
 FEBRUARY 1982  
 ENR = 3801  
 (Cumulative Totals)<sup>1</sup>

	PHASE 1-A	PHASE 1-B	PHASE 2	PHASE 3	PHASE 4
<b>WASTEWATER TREATMENT</b> (Option 1)					
<u>Costs</u>					
Capital Cost - \$K	7,698	13,344	21,073	29,082	36,695
Annual Capital Cost - \$ <sup>2)</sup>	762	1,321	2,066	2,879	3,664
Annual O&M - \$K	885	893	1,451	1,941	2,313
Total Annual Cost - \$K	1,317	2,214	3,517	4,820	5,977
<u>Units</u>					
Dwelling Units	1,768 <sup>4)</sup>	4,470	8,979	13,461	18,000
Commercial/Industrial SFE <sup>3)</sup>	594 <sup>5)</sup>	1,484	2,968	4,476	6,436
Total SFE <sup>3)</sup>	2,362	5,954	11,947	17,937	24,436
Estimated Monthly User Fee per Dwelling Unit - \$	46.07	30.99	24.66	22.39	20.25
			PHASE I		PHASE II
<b>GROUNDWATER TREATMENT</b> (Option 1)					
<u>Costs</u>					
Capital Cost - \$K			2,279		3,586
Annual Capital Cost - \$K <sup>2)</sup>			226		355
Annual O&M - \$K			334		893
Total Annual Cost - \$K			560		1,248
<u>Units</u>					
Total SFE <sup>3)</sup> (same as above)			11,967		24,436
Estimated Monthly User Fee per Dwelling Unit - \$			3.90		4.26
<b>WASTEWATER &amp; GROUNDWATER TREATMENT<sup>6)</sup></b> (Option 1)					
<u>Costs</u>					
Capital Cost - \$K			23,352		40,181
Annual Capital Cost - \$K <sup>2)</sup>			2,312		3,978
Annual O&M - \$K			1,789		3,208
Total Annual Cost - \$K			4,101		7,186
Estimated Monthly User Fee per Dwelling Unit - \$			28.56		24.51

- 1) Costs do not include any credit for potable water costs.
- 2) Capital recovery factor equals 0.0990 based on an interest rate of 7 5/8% over 20 years. This is the same interest rate and amortization period as used in the Camp, Dresser & McKee report, Unincorporated Area of Alameda Creek Watershed Above Niles, prepared for Zone 7 of the Alameda County Flood Control and Water Conservation District, May 19, 1982.
- 3) Single family equivalency.
- 4) Total dwelling units for Phase 1 are 4,470. Proration of this amount is based on staged sizing of plant, i.e., Phase 1-A at 0.5 MGD and Phase 1-B at 1.25 MGD.
- 5) Total commercial/industrial SFE for Phase 1 is 1,484. Proration of this amount is based on staged sizing of plant, i.e., Phase 1-A at 0.5 MGD and Phase 1-B at 1.25 MGD.
- 6) Assumes Phase I & II of groundwater treatment would be completed with Phase 2 & 4, respectively, of wastewater treatment.

Table J.9.1b (New)

WATER FACTORY 21  
 CAPITAL AND ENGINEERING COSTS

Treatment Process

Influent Pipeline & Pump Station		\$ 371,000
Time Clarification		826,000
Ammonia Stripping		3,094,000
Recarbonation		421,000
Filtration		946,000
Granular Activated Carbon Treatment		3,307,000
Adsorption	\$ 1,432,000	
Regeneration Furnace	489,000	
Building, Controls and Other Equipment	1,386,000	
Chlorination		396,000
Solids Handling		1,848,000
Sludge Pump Station	109,000	
Thickener	57,000	
Centrifuges	135,000	
Furnace	600,000	
Building, Controls, Piping, Electrical and Other	947,000	
Reverse Osmosis Plant		3,000,000
Blending Reservoir Injection System		2,055,000
TOTAL CAPITAL COST		\$16,264,000

Note: Site work, landscaping, electrical work, and yard piping are included in the cost of individual treatment operations according to their percentage of total capital cost. Land costs are not included. Costs shown are actual construction costs and are not adjusted for inflation.



Table J.9.1c (New)

WATER FACTORY 21  
 PROJECTED CAPITAL/O&M COSTS  
 FISCAL YEAR 1980-81 (\$/MG)  
 Assumes 15 MGD at 90% Plant Factor

Treatment Process	Annual Flow (MG)	Capital Cost Amortized 20 yrs @ 7%	Labor		Utilities		Chemicals						Maint. Matls.	Replen. Assess.	Total O&M	Total Capital and O&M
			Clcr.	Plant.	Gas	Elec.	Carbon	SOAP	Lime	Polymer	Chlorine	Acid				
Influent Pumping/ Fine Clarif.	4,928	22.93	16.60	8.50		14.74			58.83	2.19			6.07		106.94	129.87
Air Stripping	4,928	59.26	2.21	1.42		109.66							6.80		114.10	173.36
Recarbonation	4,928	8.06	6.64	5.67		11.03					7.27	10.44	4.37		45.42	53.48
Filtration	4,928	18.12	6.64	1.42		1.89							0.99		10.93	29.05
Act. Carbon Ads.	2,957	74.82	11.06	5.88		36.85							4.53		58.33	133.15
Act. Carbon Regen.	2,957	27.74	18.44	17.72	9.44	8.37	14.29						11.83		80.08	107.82
Chlorination	2,957	7.41	11.06	9.45		3.88					22.74		5.43		52.55	59.96
Solids Handling	4,928	35.40	33.19	26.93	33.29	14.83							21.11		129.34	164.74
AKT SUBTOTAL	4,928	209.75	89.62	63.77	38.95	181.60	8.57		58.83	2.19	20.91	10.44	46.42		521.32	731.07
Reverse Osmosis	1,642	172.45	49.81	10.60	0.50	394.41		31.32			1.42	30.93	145.04		664.02	836.47
Deep Well Blending	1,971	38.31	5.53	3.55		46.85							2.03	61.39	119.36	157.67
Injection	6,570	25.86	1.66	4.76		6.96							1.01		14.39	40.25
TOTAL COST Blended Water	6,570	237.78	82.99	56.31	29.34	255.80	6.43	7.83	44.13	1.65	16.04	15.56	72.69	61.39	607.17	844.95
TOTAL COST Reclaimed Water Only	4,599	323.27	116.18	78.92	41.92	345.35	9.19	11.18	63.04	2.35	22.91	22.23	102.97	61.39	816.24	1,139.51

J.9.2 "During buildout, what is the worst case cost per dwelling unit for operation and maintenance per month? (Including replacement of membranes, etc.)"

Response: See the response to J.9.1, above. Unit costs would be the highest during the first years of project construction.

J.10.0 ABAG, letter of May 16, 1983

J.10.1 "Project sponsors and the affected jurisdictions should meet with East Bay Dischargers Authority to try to resolve the export pipeline alternative before further considering the demineralization approach."

Response: Noted. This can be required as a condition of any action by the County on the Plan amendment and rezoning applications.

J.10.2 " . . . before proceeding with this project, further hydrogeological studies should be conducted to determine:

- o whether both wastewater and groundwater need to be demineralized;
- o how much groundwater must be extracted from the groundwater for treatment; and
- o whether the demineralized groundwater would be permitted to enter the potable system."

Response: We concur. These studies would be required as conditions of actions on the Plan amendment and rezoning applications.

J.10.3 "A reverse osmosis demineralization process is proposed to remove salts from project wastewater, groundwater, or both. While technically feasible, this approach will be very expensive both to build and to maintain. Future problems with either maintenance or financing could result in disposal of incompletely treated water to the Las Positas basin and contamination of the groundwater in the Livermore Amador Valley basins south of Las Positas."

Response: See the response to Comment J.9.1, regarding costs of reverse osmosis treatment. See the response to Comments J.8.1 and J.8.4, regarding maintenance and operations contingencies.

K. Flood Control

K.1.0 Department of the Army, San Francisco District, Corps of Engineer,  
Robert R. Mooney, Chief, Project Evaluation Section, Technical  
Support Branch, letter of April 29, 1983.

K.1.1 "The proposed construction project . . . will . . . require  
Department of Army Authorization . . . under Section 404 of the  
Clean Water Act . . . "

Response: The comment is noted. No further response is required  
at this time.

K.2.0 Department of Fish and Game, Memorandum of May 9, 1983

K.2.1 "We are not convinced that peak stormwater runoff will not  
increase existing flooding and erosion problems on Arroyo Laguna  
and induce natural resource damaging flood control projects. The  
statement is made on page 4-21: " . . . maximum flows from the Las  
Positas area would not coincide with peak flows in Arroyo Las  
Positas, such that the increase in the maximum discharge in Arroyo  
Las Positas resulting from development would be minor." No  
information is provided concerning timing of peak flows to support  
this contention. Figure 4.11 shows a flow of about 20 percent in  
Arroyo Las Positas to be generated by the proposal. We consider  
this a substantial increase which will make more severe downstream  
problems. Consideration should be given to diverting and storing  
peak flows within the project area.

Response: Project engineering consultants respond that their  
rough calculations indicate that the maximum flow increase for  
Arroyo Las Positas would be about 6 percent, and the maximum flow  
increase for Arroyo Laguna would be about two percent. They note  
that Figure 4.11 in the RDEIR is an inaccurate way of comparing  
increases in flow because all flows on the figure are based on  
different times of concentration. The time of concentration for  
the most remote spot in the Arroyo Las Positas watershed is about  
twice as long as that for the Las Positas development area, and  
three times as long for the Arroyo Laguna watershed.

K.3.0 Alameda County Flood Control and Water Conservation District, Zone  
7, letter of May 13, 1983.

K.3.1 "Added revenues will be needed to finance flood control  
maintenance associated with Las Positas. The Las Positas CSA  
should establish a benefit assessment that passes revenues on to



Zone 7 for flood maintenance . . . in the event that a valley wide benefit assessment and proposal by Zone 7 is not forthcoming."

Response: The comment is consistent with findings and proposed mitigation included in the RDEIR. No further response is required at this time.

K.4.0      Department of Transportation - 04, Environmental Analysis Branch,  
Memorandum of May 5, 1983

K.4.1      "It should be noted that drainage systems as proposed by developers during different phases of the buildout may potentially become inter-related systems and such work and planning need to be carefully monitored and coordinated with a Master Grading and Drainage Plan for the entire development. If improvement of off-site drainage and flood control facilities are required, where State facilities are to be impacted, mitigation measures should be made adequate for the Q100 storm . . . such that freeway facilities would not be adversely affected.

Response: The comment is acknowledged. No further response is required at this time.

L.        Solid Waste

L.1.0        Richard Edminster, Alameda County Solid Waste Management Authority, letter of May 16, 1983.

L.1.1        "1)Page 5-120c, Paragraph 4, line 5: Oakland Scavenger Company does not operate the Vasco Road landfill. Vasco Road landfill is owned by Ralph Properties and operated by DePaoli Equipment Company. Oakland Scavenger Company does dispose waste from the City of Livermore at Vasco Road landfill; waste from Dublin is disposed at Altamont landfill. Vasco Road also receives waste from Pleasanton Garbage Service and from public deliveries."

"2)Page 5-120d, paragraph 2: Oakland Scavenger Company's Livermore-Dublin Disposal Service is not the only available scavenger service. The County or Las Positas CSA could franchise with Pleasanton Garbage Service or an entirely new scavenger."

Response: The FEIR is hereby revised to incorporate these corrections.

L.1.2        "The Final EIR should note that if ACSWMA considers the disposal of solid waste from Las Positas at one of the County landfills to be significant modification of that landfill, then the disposal would be subject to Authority approval."

Response: This is hereby noted.

M. Transportation

Streets and Highways

M.1.0 Department of Transportation -04, Environmental Analysis Bureau,  
Memorandum of July 30, 1982

M.1.1 "Baseline" traffic and traffic generated by other approved or proposed developments in the Livermore-Amador Valley should also be included (on the same - Figure 5.11 or 5.12 - diagrams or parallel diagrams); mainline and turning volumes at ramp intersections should be shown."

Response: The transportation analysis has been revised, and is included as an Appendix to the EIR. Figures 4-AM1 and 4-AM2 of the revised analysis indicate year 2005 projected traffic volumes, without Las Positas, and Figures 4-AM2, 4-PM2, 4-AM3 and 4-AM4 volumes with Las Positas, through the Livermore-Amador and San Ramon Valley major roadway network. Existing and year 2005 land use data are based upon Projections '83, prepared by ABAG. The ABAG 1983 population and employment data for the study area were disaggregated by referencing the TJKM Tri-Valley study data for 60 smaller analysis zones. Year 2005 data were extrapolated from year 2000 ABAG forecasts. I-580 mainline and ramp volumes for year 2005, with Las Positas, are shown in Figures 5a, 5d, and 5e of the Analysis for three alternative freeway design concepts.

M.1.2 "Figure 5.13 should show all on- and off-ramps of I-580. Ramps for SR84/Springtown and Vasco Road are not depicted."

Response: A revised analysis of impacts on I-580 is included in the revised transportation analysis. Figures in the Analysis indicate all on- and off-ramps.

M.1.3 "We agree with the statement on page 5-106 (June, 1982 DEIR) that AM and PM peak hour volumes are needed for capacity analysis. Such volumes are, however, not shown on Figure 5.14 . . . "

Response: Data (figures and tables) in the revised transportation analysis indicate both AM and PM peak hour volumes.

M.1.4 " . . . the trip distribution should be determined by means of a gravity-type model involving all production and attraction volumes, including all proposed developments as well as established employment and residential areas, and travel impediments . . . " (rather than assuming certain percentages for assigning LP employees to a number of residential areas).



Response: The revised transportation analysis bases traffic impacts and resultant mitigation measures on the results of application of a UTPS model which forecasted and assigned anticipated traffic generated by the project, as well as other approved and anticipated developments in the Area. UTPS is a system of computer programs developed by the U.S. Department of Transportation for development of regional traffic forecasts. UTPS is used by most metropolitan planning organizations, including MTC, for transportation planning. As noted in response to Comment M.1.4, above, existing and year 2005 land use data were based upon ABAG's Projections '83.

- M.1.5 "The 20%-30% reduction . . . due to TSM measures is probably a reasonable mid-range approximation but an overestimate where public transit service is inadequate. Modal splits may vary significantly from location to location, depending on factors involved . . . (Proponents) should propose specific public transit networks and line capacities, and the forecast modal splits should reflect the projected patronage figures."

Response: The comment is acknowledged. The estimate for transit use was that 4 percent of home-based work trips into Las Positas and for home-based work trips out of Las Positas would be by transit. No other trip purposes (i.e., shopping, social, etc.) were assumed to use transit. This translates into a 2 percent reduction in peak vehicular volumes, in that approximately 55 percent of peak hour volumes is estimated to be home-based work trips. Line capacities for specific transit systems cannot be ascertained; while local transit system expansion can reasonably be expected, it cannot be definitively planned for the year 2005 at this time. The transportation consultants note that the use of a 4 percent peak work trip mode split is conservative, in that the existing mode split is 3 percent of all peak work trips in Livermore. The use of 4 percent of work trips would indicate little dependence upon this mode in reducing peak volumes. They note that with a normally aggressive TSM program, peak hour mode split for all trips could easily rise to five to six percent in the Livermore Valley, and perhaps higher in Las Positas.

- M.1.6 "The use of 2% to 3% annual growth factor . . . for baseline volumes may be a reasonable approximation as long as it is used only for estimation of external-internal . . . trips. However, the number of growth rate of trips produced in and/or attracted to the study area should be developed from specific local data.

Response: This approach is used in the revised Transportation

Analysis, included as an Appendix to this EIR. See the response to Comment M.1.1, above.

M.1.7 " . . . thus, the other 40% of employees would be in-commuting to LP from outside the PMA: i.e., mainly via I-580 west of and I-680 north and south of the PMA. Traffic impact on these segments and on SR 84 between Livermore and Sunol should also be addressed."

Response: The revised transportation analysis indicates projected impacts on these and all other major routes in the Livermore-Amador and San Ramon Valley area.

M.1.8 "The above percentages and the figures for LP shown on Table 2.2 . . . indicate that . . . 15,423 Las Positas would out-commute to work. This is about 16% more than the . . . 13,317 in-commuters. yet the AM peak hour inflow shown on Figure 5.11 . . . exceeds the outflow . . . by 25%. This numeric discrepancy of about 40% should be explained . . ."

Response: The transportation planning consultants note that standard trip generation rates were based (depending upon the forecast methodology used) upon ITE, CalTrans, and HCHRP data. Trip generation rates are not uniform and are not well correlated with population and employment numbers.

M.1.9 "What are the assumed work destinations of the future 15,423 Las Positas not employed in their town of residence?"

Response: This was not developed for the analysis in the Draft EIR.

M.2.0 Department of Transportation - 04, Environmental Analysis Bureau, Memorandum of May 5, 1983

M.2.1 "As we said in our July 30, 1982 comments, Interstate 580 will not accommodate the Las Positas AM and PM peak hour traffic."

Response: This is consistent with findings in the revised transportation analysis.

M.2.2 "The cost of any mitigation measures requiring improvements on State facilities, including freeway ramps, will have to be paid for by the development as there are no proposed projects programmed in the vicinity of this development."

Response: The comment is noted. The project's share of costs for

off-site roadway improvements are indicated.

- M.2.3 "We refer to Caltrans' comments of 7/30/82 . . . The County's response (in Appendix B of the Revised DEIR) . . . is limited to noting the need for encroachment permits to work within the state right-of-way. There were no responses to three pages of our comments . . . Some of the changes from the original to the revised DEIR may have been prompted by certain of our original comments which were thus rendered moot, while the majority of our comments are still of concrete significance. By the definition of the scope of the two DEIR's . . . our original comments shall remain to be considered and responded to by the lead agency."

Response: The current FEIR includes responses to all Caltrans comments on the June 1982 DEIR and March 1983 Revised DEIR. Items M.1.1 through M.1.9, above, are extracted from Caltrans comments on the June 1982 report.

- M.2.4 "In order to determine the extent of roadway improvements necessary to mitigate the impacts, cumulative AM and PM peak hour volumes at buildout . . . should be shown on diagrams covering the significantly affected portions of the network. Such diagrams, or at least the volumes, must be presumed to have been available for determination of mitigating improvements listed. These integrated support data should be included. Of primary concern to Caltrans are the volumes on ramps, intersections at the foot of ramps (including all turning movements), freeway segments significantly impacted, and conventional State Highways and their intersections . . . "

Response: Cumulative AM and PM peak hour volumes are shown in tables and figures in the revised transportation analysis. Support data is included in the Technical Appendix to that Analysis.

- M.2.5 (Re. Table 5.31) "It would be appropriate to tabulate the following separately:
- a. regional traffic projections (i.e., existing plus increments due to regional, Bay Area, growth factors);
  - b. cumulative local traffic (i.e., from the Livermore-Amador Valley or Primary Market Area), and
  - c. project traffic (Las Positas)



Finally, the combined effects of the three categories could be shown."

Response: This is done in the revised transportation analysis.

M.2.6 (Regarding Transportation System Management Measures)" . . . specific proposals as to financing, networks, like capacities, patronage estimates, etc., should be evaluated to corroborate a realistic estimate of their modal share.

Response: Specific proposals for transit are not developed at this time. Because of this, the revised transportation analysis was developed to indicate a "worst case" condition without any reductions in volumes resulting from implementation of TSM programs.

M.3.0 Comments by the City of Livermore on the Revised Draft Environmental Impact Report . . . received May 16, 1983

M.3.1 "This DEIR has repeated several mistaken assumptions made in the first EIR, which leads to a significant underestimate of impacts on air quality and transportation systems . . . (e.g.) (a) the assumption that 60% of peak hour and 65% of average daily traffic will be internal to the project is not substantiated . . . (and) (b) no information concerning salaries of Las Positas employees is given and correlated with housing prices . . . to substantiate the DEIR's assertion that (80%) . . . of Las Positas employees will live within the project . . . (c) Furthermore . . . the (TSM) program is assumed to reduce traffic effects by up to 25% . . . Since there is no demonstration of firm commitments to all aspects of the TSM program, the DEIR should analyze impacts that would result if a portion or none of the program were implemented . . . Use of the worst case assumptions regarding TSM and . . . internal traffic is particularly important . . . "

Response: (a) In the Draft EIR and Revised Draft EIR, the transportation analysis was based primarily on an extrapolation of trends and research conducted for similar large-scale projects. This comment by the City of Livermore, and by others, on the draft document indicated that a more detailed and refined transportation analysis was needed. As a result, a revised transportation analysis was prepared, and included as an Appendix to this FEIR. The revised Analysis bases the traffic impacts and resultant mitigating measures on the results of application of a UTPS computer model which forecasts and assigns anticipated traffic generated by the project, as well as other approved and

anticipated developments in the area.

In the revised transportation analysis, one of the key findings was the percentage of Las Positas traffic which would remain on-site; approximately 29 percent would be internal, and 71 percent external to the project area. This was developed directly from the trip tables of production and attraction trip-ends from zones in the Las Positas area.

(b) Only general information on types of project area employment can be developed at this time. This type of information, however, was not essential to the traffic modeling undertaken in the revised transportation analysis.

(c) Three types of mitigating measures have been identified to alleviate the negative traffic impacts of the Las Positas project; they are a valley-wide transportation planning study, a transportation system management (TSM) program, and physical improvements to freeways, arterials, and intersections to increase their capacity. In the revised transportation analysis, only the last of these (facilities improvements) is quantified in terms of minimizing impacts. This would be equivalent to a "worst case" scenario as far as assumptions of TSM effects are concerned. However, it is emphasized here that all three measures would be needed in order to cope successfully with the future travel demands to be placed on it by Las Positas and other developments.

M.4.0      Bay Area Air Quality Management District, letter of May 16, 1983

M.4.1      (a)"We believe that the calculation which includes a 25% reduction . . . traffic volumes due to (TSM) . . . is still overly optimistic . . . (b) A candid display of the mitigation impact of TSMs on air quality would be one that separates out those committed to, or at least realistically achievable . . . (c) Also useful would be modeling of the traffic and resultant CO impacts of a smaller proportion of internal- as compared to external-traffic."

Response: (a) The current comment by the District, and by others, is not inconsistent with findings of the Revised DEIR. There it is stated that a 25 percent reduction could be regarded as a maximum and that actual levels of effectiveness would fall between this and levels indicated without any TSM (RDEIR, p.5-136).

(b) The transportation consultants were asked to provide a fuller

discussion of available TSM measures, as well as a conservative or "worst case" estimate to illustrate how realistically achievable TSM measures might work. Three areas were reviewed: ridesharing strategies; increased transit use; and variable work hours. The reduction of peak-hour vehicle work trips through the application of these total 25 percent; approximately 55 percent of the peak-hour volumes are work trips, resulting in a net reduction of about 14 percent.

It is emphasized that these are very preliminary and rough estimates, based on the general description of the project available at this time.

#### Ridesharing Strategies:

This category includes the effects of carpooling and vanpooling incentives which are designed to increase average vehicle occupancy during the peak hours. The package of measures includes carpool-matching assistance and promotion among organizations with over 75 employees, preferential parking spaces for employees using carpools, including disincentives for single-occupant vehicles, and vanpool availability for employers with more than 200 workers. The vanpool market is generally considered to be for longer trips (greater than 10 miles) without high levels of transit service. By project buildout (year 2005) this situation could occur in Las Positas where it is expected that work trips would average 25 to 30 minutes (or 12 to 15 miles).

Currently (1980 Census working papers) occupancy characteristics for auto trips in the Livermore area show that 90 percent of commuters drive alone, with another 8 percent in two-person carpools. Average vehicle occupancy for work trips was 1.12 persons per vehicle in 1980. The average work trip length was 25.4 minutes, slightly above the regional average of 24.3 minutes. Using ridesharing programs, the consultants estimate that average work trip auto occupancy could be raised to 1.17 persons per vehicle, with a distribution of 86 percent single occupant and 11 percent two-occupant vehicles. Carpooling incentives could thus result in a reduction of approximately 4.5 percent of peak-hour work trips. The vanpooling program, if assumed to capture 10 percent of eligible workers, would result in volume reduction between two and three percent of work trips. Preferential treatment for carpools and buses is estimated to contribute to a one percent reduction in vehicle trips. Thus, a total reduction of approximately seven percent of total work trips would be attributable to carpooling strategies.



#### Increased Transit Use

The transit mode currently serves approximately three percent of the work trips in the study area. With the increased population and employment densities proposed for Las Positas, it can be expected that the transit split would increase, to approximately five percent. This increase would be accomplished through the addition of bus routes, and through increased frequency on existing routes. There may be a particular need for express bus service connections to the BART terminus. Implementation of park-and-ride facilities would also enhance the use of express bus service.

Bus transit service expansion, therefore, would lead to an approximate two percent reduction in vehicle work trips associated with Las Positas.

#### Variable Work Hours

The use of staggered or flexible work hours serves to reduce the peaking characteristics of work trips by redistributing trips to adjacent hours. In the Livermore area the proportion of traffic volumes in the PM peak, compared to 24 hour weekday volumes (AWDT) is between 11 and 13 percent. (In the RDEIR trip generation analysis, it was assumed that approximately seventeen percent of daily vehicle trips would occur during the PM peak hour. This assumption is adjusted downward in the Revised transportation analysis, included as a part of this FEIR). Implementation of variable work hours has the potential for reducing this peak hour percentage (13 percent) to 11 percent, even if only 15 percent of employees were to shift out of the peak hour.

The net reduction in peak-hour vehicle work trips associated with this strategy is projected to be approximately 15 percent. Shifts of this magnitude, and greater, have been widely observed.

(c) In the revised transportation analysis, one of the key findings was the percentage of Las Positas traffic which would remain on-site; approximately 29 percent would be internal, and 71 percent external to the project area. This was developed directly from the trip tables of production and attraction trip-ends from zones in the Las Positas area.

M.5.0.     County of Alameda Public Works Agency, H.A. Flertzheim, Jr.,  
                 letter of May 17, 1983

M.5.1     What mitigation is proposed for the increased traffic loading on  
                 I-580 and I-680?

Response: Improvements to off-site roadway facilities, including I-580, required to mitigate project traffic impacts were presented on pages 5-137 through 5-140 of the Revised DEIR; costs to Las Positas were given in Table 5.37 of that document. These proposals and costs are superseded by revised proposals and estimates included in the revised transportation analysis. Lane requirements for I-580 Freeway, with and without Las Positas, are presented in Table XII (p. 70) of that document.

M.5.2     (a) How valid are assumptions for Transportation System Management (TSM)? (b) What happens if TSM does not work and what are the steps which this project will take to address the impact?

Response: (a) Refer to the response to Comment M.4.1, above.

(b) The revised transportation analysis serves to model this. If TSM programs are not implemented in Las Positas or in other major developments in the Valley, substantial improvements to the roadway system would be required if tolerable traffic conditions are to be maintained.

M.5.3     In the traffic analysis, what assumptions were made on the offsite development in this Valley? What steps are proposed to address the impacts of alternate Valley development?

Response: In the Draft EIR and Revised Draft EIR, the transportation analysis was based primarily on an extrapolation of trends and research conducted for similar large-scale projects. The revised transportation analysis used existing and year 2005 land use data based directly upon ABAG's Projections '83. A valleywide transportation study, involving the participation of other planning agencies, would need to be undertaken to assess alternative assumptions regarding valleywide growth. Such a study is beyond the scope of the current EIR.

N.        Air Transportation

N.6.0     Richard Edminster, Alameda County Airport Land Use Commission,  
            letter of May 16, 1983.

N.6.1     The (ALUC) staff report concludes that the proposed land uses, within the ALUC's General Referral Area for Livermore Airport, appear to be consistent with the County ALUC Plan, with specific development projects to be referred to the ALUC.

Response   The comment is acknowledged. No further response is required at this time.

N.6.2     The DEIR, as reported in the ALUC staff report, stated that the proposed project would generate demand for approximately 175 general aviation aircraft spaces at the Livermore Airort and would accelerate the need for other airport improvements such as a second parallel runway. The ALUC voted to advise the Planning Commission that the cumulative impact of the proposed new town on Livermore Airport constitutes a significant adverse impact under CEQA.

Response:   Noted. The Livermore Airport is a municipal facility operated by the City of Livermore. Any additional aircraft storage facilities, to accommodate demand generated by Las Positas residents and businesses would need by approved by the City. The capital and maintenance costs of these additional facilities would be partially offset by user charges.



CSA and Alternatives

1.0 Official Position Statement of the City of Livermore, presented by Mayor Dale Turner at the Planning Commission hearing on April 25, 1983

1.1 " . . . The city has spent well over \$800,000 to install oversize sewer, water and other utility lines to serve the area north of Interstate 580. In addition the City has made applications for and expanded wastewater treatment facilities, and has actively participated in the Livermore-Amador Valley Water Management Agency . . . The City feels these past and present actions indicate our willingness and our ability to provide public services and facilities necessary to serve the Las Positas area . . . . "

Response: The comment is acknowledged. Staff agrees that the City's General Plan proposals include some amounts of residential development in the southeasterly portion of the Las Positas valley, adjoining the Springtown area. The City's phasing policy indicates that this development would not occur until after 2000. The remainder of the Las Positas project area is shown for open space uses. This is noted in the DEIR.

1.2 "The proposed public services plan, especially in the areas of sewage treatment and disposal, fire, police, and library are still inadequate."

Response: The comment is acknowledged. Refer to comments on fiscal impacts relating to specific services for further discussion.

2.0 Roland Mayne, Executive Officer, Local Agency Formation Commission, letter of May 11, 1983.

2.1 "Although certain statements of objectives as listed . . . (in) the original EIR have been deleted, the objective of the proposal remains the same: e.g., one that the ultimate control of the development lies with the county. There has not been a review of the impact of this objective . . . No place does the report deal with the problem of the County becoming involved in the provision of urban services instead of requiring that they be provided by a municipality."

Response: These impacts are addressed in Section 5.8 of the Revised DEIR where it is noted that "the two key agencies

(affected by the creation of the CSA) would be the County Administrator's Office and the County Public Works Department. Over time, increased general purpose revenues from Las Positas would offset this burden, but initially a good deal of effort would be required to establish and maintain the CSA. The Planning Department would also be affected, although most of its services should be offset directly by charges for services rendered. The Board of Supervisors would experience an increased workload, both in the creation of Las Positas and in its maintenance. So long as Las Positas remains a CSA, the Board of Supervisors would be managing an urbanizing area, with all the associated citizen complaints, planning issues, etc.. All major actions regarding construction contracts, fund management, and adjustments of user charges would be decided by the Board of Supervisors.

"The County Administrator, Public Works, and Planning Department could add staff to offset impacts on their level of service to other Alameda County residents. The Board of Supervisors' time and agenda, however, are relatively fixed resources. Insofar as the Las Positas CSA would infringe upon the Board's agenda, other County issues may not receive timely attention, resulting in an impact upon other County residents." (RDEIR, page 5-170).

- 0.2.2 "The proposal puts the County in the position of being the developer for the project . . . (T)here are certain philosophical as well as procedural questions that should be resolved. The County . . . will be required to satisfy the needs of 51 property owners . . . and also to assure that the project proceeds at a pace sufficient to cover the various development costs. The dual role . . . may put the County in a position of having a conflict between its functions of controlling and assuring adequate development and its necessity to promote the development . . ."

Response: The comment is noted. Certain of these potential conflicts could be resolved by assuring that a complete Development Agreement has been negotiated before each phase begins. Any uncertainties regarding sources of financing and responsibilities of the sponsor, individual landowners, developers, and the County and other agencies could be resolved at the outset.

- 0.2.3 "The report should include the impact of a potential County provision of urban services to this area (which) would be chargeable against the CSA. This would possibly at a minimum include police services and animal control."

Response: Direct and indirect costs of a County Service Area are included in the fiscal analysis (Section 5.8 of the Revised DEIR).

0.2.4 " . . . there should be a separate and specific alternative reviewed that would provide for an orderly extension of the infrastructure of the City of Livermore to provide services for the development. This could be easily accomplished by different phases of the project."

Response: CEQA requires that all reasonable alternatives to the project be described which could feasibly attain the basic objectives of the project. Reasons why these have been rejected in favor of the ultimate choice must also be given. The discussion of alternatives must focus on those capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives substantially impede the attainment of the project objectives, and/or are more costly. Because CEQA emphasizes identification of alternatives with lesser environmental impacts, the analysis of issues such as project financing and administration and to fiscal impacts, need not be as detailed as that which may be needed in LAFCO's review of the proposed CSA and service alternatives. LAFCO may subsequently determine that additional detailed analysis of fiscal/financial/administrative arrangements must be developed for its own purposes. This analysis may take the form of a staff analysis, or that of a Supplement to the current EIR.

#### IDENTIFICATION OF ALTERNATIVES

Annexation of the project to the City of Livermore is identified in the RDEIR as an alternative for the provision of public services. This alternative, by itself, would result in impacts on the physical environment which would be very similar, if not identical with those of the proposed project; shifting service and planning responsibilities from the County to the City would not eliminate potential impacts inherent in the current proposal for land uses, etc..

#### DISCUSSION OF IMPACTS OF PROJECT ALTERNATIVE

The current discussion considers the effects which could result if the project were annexed to the City of Livermore, that is, impacts associated with shifting governmental and service responsibilities from the County to the City of Livermore. A



basis assumption here is that there would be no other significant differences between the alternative projects except as would logically result from this transfer of responsibilities.

Impacts on the Natural Physical Environment: Atmospheric, Biologic, Geologic, and Hydrologic Conditions.

Project impacts on the natural physical environment would be very similar, if not identical, whether the development were served by a CSA or by the City. Primary differences relate to the mechanisms for mitigating certain impacts. For example, air quality impacts of project traffic could be partially mitigated by the City through extension of existing RIDEO transit services, rather than through establishment of a new transit system or through a CSA contract with the City for RIDEO service. Potential project impacts on local and off-site groundwaters could be reduced through use of an export pipeline for the disposal of wastewaters; this option, however, would also be available to the proposed CSA.

Impacts on Employment, Economic and Population and Housing Conditions

Impacts of the project and alternative would be comparable.

Consistency with Public Plans and Policies

Annexation of the area to the City would be more consistent with LAFCo, County, City and Regional policies.

Impacts on Public Rights-of-Way and Easements

Impacts of the project and Annexation alternative would be comparable.

Impacts on Public Services

. Police Protection

It is expected that staffing requirements for the project area would be very similar. The project could possibly be served from the City's existing police station, thus eliminating the need for a new station in Las Positas under the CSA proposal.

Fire Protection

A portion of the Las Positas project area, generally to the east of North Livermore Avenue and south of Hartford Avenue

could be served by the existing fire station in the Springtown area. This would possibly eliminate the need for one of the three stations currently proposed for Las Posita

#### Education

Impacts would be comparable.

#### Recreation

Additional park acreage would probably be required insofar as City, rather than County standards would apply. Impacts on Regional facilities would be comparable.

#### Library

Facility requirements would be comparable.

#### Health Care

Impacts on health care facilities and programs would be comparable.

### Impacts on Public Utilities

#### Water

Demand would be identical. A portion of the project area could be served by existing trunklines in the Springtown and Chabot College areas. Impacts on Zone 7 treatment and distribution facilities would be comparable.

#### Wastewater Treatment and Disposal

Treatment and disposal requirements would be identical. A portion of the Las Positas project area could be served by existing trunklines in the Springtown and Chabot College areas. Additional wastewater treatment and disposal capacity would be needed in either case. Annexation to the City could possibly minimize some of the "political" obstacles to development of a valleywide solution for disposal of wastewaters generated by major developments such as Las Positas.

### Impacts on Transportation Facilities

Impacts would be comparable. Annexation may result in some organizational advantages for mitigation of traffic impacts, insofar as the City has an existing transit service organization (RIDEO).

### Fiscal Impacts

#### Capital Costs

Some reduction in capital costs would occur under the annexation alternative. These would pertain to fire and police protection. Responsibility for approval of an acceptable financing plan would shift from the County CSA to the City. Existing landowners, project developers/builders, future residents and businesses, and public agencies would assume similar burdens in both cases.

#### Ongoing Costs and Revenues

The City, rather than the proposed Las Positas CSA, would finance ongoing operations of the sewage system, water system, and street lighting system; the City would also administer the capital funds distributed to other agencies. In both cases revenues for the ongoing costs for these services would be derived from user charges. The City would also provide fire and police protection services and general government services. These would be funded out of general revenues (property taxes, state subventions) which would shift, in part, from the County to the City on annexation of the Las Positas area. Some efficiencies could result through the use of the existing City administrative organization. It is not known whether additional personnel would be needed as the project developed.

### Alameda County General Government

#### General Fund

Costs for health services and social services would be comparable in both cases. Revenues to the County would be reduced under the annexation alternative.

#### Road Fund

Impacts on the County Road Fund would improve. Responsibilities for maintenance of roads in the Las Positas area would shift to the City.

#### Library Fund

Responsibilities for library services would shift to the City.

#### Structural Fire Fund

The City would provide fire protection services.

### Impacts on Public Service Agencies Other Than Alameda County



Livermore Valley Unified School District  
Impacts would be comparable.

Livermore Area Recreation and Park District  
Impacts would be comparable, unless the annexation alternative included considerably more parkland than under the CSA proposal.

Alameda County Flood Control and Water Conservation District, Zone 7  
Impacts would be comparable

City of Livermore

Project impacts previously discussed in the EIR would remain essentially unchanged:

. Las Positas residents would depend upon commercial services available elsewhere in Livermore. This would add to Livermore's sales tax revenues.

. Existing public services provided by Livermore would also be affected, particularly libraries, police and fire protection services, and public transit service.

The City would also assume responsibilities for operation and maintenance of services and facilities in the Las Positas area. These are discussed above. However, a number of general government responsibilities would remain with the County, including health and welfare services and countywide Sheriff services.

REASONS WHY THE ALTERNATIVE WOULD BE FAVORED OR REJECTED

The basic objective of the sponsor is the development of urban residential, commercial, industrial and public uses in the Las Positas project area over a period of time beginning roughly in 1985 and extending over a 20 or so year period to 2005. To this end, the sponsor has applied to the County for amendment to the County General Plan and for rezoning to permit the proposed land uses, and further intends to request approval by the County and by LAFCo of the formation of a County Service Area to fund provision of a number of services to the development.

Staff concludes that this governmental alternative would not, in itself, reduce or eliminate many of the significant adverse environmental effects of the proposed development. Basic changes to the project and the implementation of number of mitigation

measures would be required to reduce these potential effects, irregardless of which agency, the County or the City, was principally responsible for regulation of the project.

The alternative of annexation would be more consistent with adopted objectives of the County General Plan, and with many of the basic objectives of ABAG and the Local Agency Formation Commission. However, any action by the County of the proposed Plan amendment need not preclude annexation of all or part of the Las Positas area to the City as the appropriate means for providing public services and regulating future development and land uses. If it is determined by the County that development through annexation would be preferable to the proposed use of a CSA, the County may condition its actions on the Plan amendment and rezoning applications to establish annexation to the City of Livermore as its first priority for providing services to the project, and to require the sponsors to pursue all reasonable avenues to obtain the necessary commitments from the City. Further, LAFCO may establish similar requirements in its deliberations on the proposed CSA.

0.3.0      Comments by the City of Livermore on the Revised Draft Environmental Impact Report . . . received May 16, 1983

0.3.1      "The DEIR fails to compare the relative environmental impacts of the alternatives (to the CSA) with those of a CSA . . . the DEIR fails to analyze adequately the alternative of annexation to the City of Livermore . . . "

Refer to the response to Comment 0.2.2, above.

0.3.2      "Other LAFCo policies expressed in earlier actions on Livermore's sphere of influence are highly relevant to Las Positas and should be set forth in the EIR (cited) . . . The proposed Las Positas CSA contradicts each of these policies . . . "

Response: Refer to the response to E.4.0.

0.3.3      "No effort was made by those preparing the DEIR to confer with the City of Livermore on the possibility of annexation . . . "

Response: Noted. The Alameda County Planning Director has recently been in contact with the City Manager of the City of Livermore regarding this issue.

0.4.0 Alameda County Public Works Agency, H.A. Flertzheim, Jr., letter of May 17, 1983.

0.4.1 "What effect does the CSA have on Public Works staffing in absolute numbers?"

Response: Specific staffing estimates have not been prepared. However, all capital cost estimates include funds for design and administration. Also, operating costs include funds for both administration and operational personnel. Further, CSA costs include an overhead amount calculated at five percent of annual operating costs. A specific staffing plan has not been developed although the fiscal analysis includes funds for the positions addressed in the comment.

0.4.2 How would the staff requirement be distributed between administrative and operational personnel?

Response: Refer to the response to Comment 0.4.1.

0.5.0 ABAG, letter of May 16, 1983

0.5.1 "Instead of fostering coordination of service delivery and financing capabilities of the existing cities and special districts, the proposal would create yet another independent governing entity and financing mechanism . . . The Final Environmental Impact Report should give fuller consideration to the alternative of annexation to the City of Livermore."

Response: Refer to the response to Comment 0.2.2. The CSA would be a new funding mechanism, with a new administrative staff. It should be clarified that the CSA (as compared to a CSD) would be governed by an existing governmental entity, the County Board of Supervisors. The point may be made, however, that the Board would be assuming a major new responsibility through the CSA.

0.5.2 "Of major concern to ABAG is the precedent-setting effect on Alameda County and other counties in the region of amending a county plan to permit large-scale urban development in an unincorporated area, outside of existing cities' urban service limits, where adequate facilities are neither in place nor committed in capital budgets . . . ABAG policies support annexation to the City of Livermore; we would like to see Alternative 7.6 examined more fully in the FEIR. Of the other alternatives presented, staff believes Alternative Land Use



Diagram with Comparable Housing and Employment (7.5) to be more realistic than the preferred alternative."

Response: Refer to the response to Comment 0.2.2.

- 0.5.3 "If the project is to proceed to buildout as proposed, the mitigation measures to control the pace, scope and quality of development will only work if the County Board of Supervisors actively controls the development process throughout the project period. There can be no assurances that the mitigation measures will be implemented if the CSA board were to be locally elected residents or if the area should incorporate."

Response: We generally concur with the comment. If the area were to incorporate the new city would have responsibilities and authority for land use planning, in addition to any responsibilities for public services which it might take over from the County CSA. While the new city would not be fully bound to all the conditions for impact mitigation set by the County, it nevertheless would be required (in its General Plan, for example) to deal with the same range of social, economic, environmental and political issues which would confront the County.

- 0.5.4 "The financial plan should clearly indicate how revenues from the proposed project will be provided to the other public agencies that will be financially affected by the development (e.g., the City of Livermore for costs of library services and traffic improvements)."

Response: We agree.

- 0.6.0 Residents of Bel Roma Rd., Letter of May 14, 1983.

- 0.6.1 "Las Positas Land Company is proposing a County Service Area to be run by the Board of Supervisors, which in turn will increase costs to the taxpayers for support of the CSA for the benefit of one entity - Las Positas Land."

Response: CSA operating and maintenance costs will be funded by revenues derived from user charges for services provided by the CSA. County taxpayers would not be required to subsidize the CSA.

- 0.6.2 "Because the proposal does not adequately explain assessment districts/special taxes to property owners, residents of Bel Roma - May School Roads are opposed to being included in any form of assessment at any time during development until such time as our

individual properties are developed."

Response: An assessment district can be established in such a way as to exclude the Bel Roma - May School Roads area until such time as these areas develop. It is also possible to include the subject area in an assessment district, but to not impose any assessment fees here until development occurs.

P.        Fiscal

P.1.0        Betty Carrell, President, Board of Education, Livermore Valley  
Joint Unified School District, letter of April 22, 1983

P.1.1        "It is still the position of the Board of Education that there must be a guarantee prior to any approval of the Las Positas development, that adequate school facilities will be available when and where they are needed. The Board must be assured the construction of new schools in the development is accomplished in a manner that will avoid the overcrowding of existing schools and the potential reduction of the quality of education that overcrowding can cause . . . the revised DEIR does not provide these guarantees and assurances. Three alternate means of financing new school construction are mentioned in the DEIR, none of which assures the District of the timeliness of construction (: ) 1) Developer fees; by the time enough fees have accumulated to even start construction of a school, the project will be close to the end of Phase I. This will inevitably result in the overcrowding of existing schools . . . 2) State Building Fund . . . is not a reliable means . . . since the demand for these funds may exceed their availability . . . (and) . . . there is no assurance the Livermore School District will have high enough priority to receive any of the available funds . . . 3) Special Assessment District/Community Facilities District . . . The Board agrees that these funding measures are not reliable."

Response: The fiscal consultants concur with the comment. Developer fees are not reliable because of uncertainty about the time of collection due to changes in the rate of development. The State Building Fund is not reliable because of the competition for funds. Finally, a Special Assessment District cannot be used in California for facilities such as schools that are for the general welfare rather than of specific benefit to property.

The consultants conclude, however, that a Community Facilities District appears to be a practical and reliable mechanism for financing school construction, but note that there is initial uncertainty about this mechanism since it has not yet been used in California or validated by any court. A Community Facilities District could be established at the start of each phase and the required school facilities could be financed with special taxes or with bonds to be repaid from special taxes. In any case, it would be essential that an enforceable agreement be in place to provide for the schools before construction of each phase is authorized.



- P.1.2 The surest way of providing schools . . . is for the sponsor to advance fees sufficient to construct all Phase I schools."

Response: While sponsors' advances are a sure way of financing school costs, the resulting costs would either be reflected in lower land values or passed forward to purchasers of housing. An alternative is to use bonded debt levied against all property in the Phase I area. It is recognized that the sponsor might be the only available purchaser of the bonds, but as the development actually occurred, it might be possible to demonstrate the credit-worthiness of the bonds and resell them in the municipal bond market.

- P.1.3 "Mitigation of the Board's concerns . . . should be a condition of approval of the sponsor's application for General Plan Amendment. Furthermore, to ensure that these conditions remain binding, it is proposed that an agreement be entered into between the County . . . and the . . . School District to the effect that no unilateral action will be taken in the future to alter or waive these conditions . . . "

Response: Refer to the response to Comment H.1.3.

- P.2.0 Supervisor Fred Cooper, letter of May 3, 1983

- P.2.1 "Have any of our financial projections for Las Positas considered possible penalties from the State for not meeting our ABAG-state quota?"

Response: No. Such an analysis would be appropriate if legislation to this effect is enacted into law.

- P.3.0 Bart J. Schenone, Haley, Schenone, Birchfield & Smith, letter of April 25, 1983

- P.3.1 " . . . a modification to the proposal by the Las Positas Land Company was not set forth by the report. On Page 2-13 of the revised Draft Environmental Impact Report the Public Land Fund is described as being comprised of fees collected at time "an unsubdivided parcel is sold, or if a landowner wishes to develop, at the time a tentative subdivision map is approved by the County." In September, 1982, in response to comment, the Las Positas Land Company modified its proposal so that the fees . . . would occur at the time of recordation of the final map. It was further proposed that at that time . . . land could be dedicated in lieu of fees to the extent of the value of the land dedicated."

Response: Noted. This is consistent with the fiscal analysis, although for purposes of analysis it was assumed that all developers would pay the in-lieu fee on their entire developed acreage (page 5-153).

P.4.0      Susan Steinberg, Chairman, Livermore Committee for Quality Education, address to Planning Commission, April 25, 1983.

P.4.1      " . . . The Livermore School District simply cannot be forced by the county to provide for the proposed new development, in Las Positas Valley, which would not be under legal obligation to make any financial commitment or property donation to the School District, as city developments must do."

Response: Noted. Refer to the response to Comments P.1.1 through P.1.3.

P.4.2      "There has been no offer of legal commitment to the (School) District to ensure that the extensive buildings, staff, and educational materials and services needed for the residents of this development will be paid for out of funds generated by the project, or offered by the developer."

Response: Noted. Refer to the response to comments P.1.1 through P.1.3.

P.5.0      Gail Vardanega, address to Planning Commission, April 25, 1983.

P.5.1      "The EIR says the proposed price per acre is \$10,000. Who determines this price?"

Response: The base value of \$10,000 per undeveloped, unimproved, unserved land was initially determined by Wilsey & Ham who indicate that this would be the for improved residential and commercial sites comparable to similar types of facilities sold in Alameda County; the value was established for purposes of conducting the fiscal impact analysis. The actual prices of properties (for either private or public uses) would reflect market conditions at the time of sale, and may be higher or lower than \$10,000.

P.6.0      Charlotte Lundberg, Deputy County Librarian, Alameda County Library System, letter of County Administrator's Office (cc. to Planning Department) May 10, 1983

P.6.1      "What assumptions have been incorporated into the projected

property tax figures shown in Library Fund Analysis Table 5.50 Page 5-179? . . . It appears . . . that constant 1982 dollars have been used to reflect cost of service figures but that property tax revenue estimates with the caveats and assumptions outlined . . . to wit . . . the mathematical model used to calculate assessed property values (assumes annual turnover rate of 10% for residential properties and 5% for commercial properties, no turnover for industrial, and an inflation rate of 7%) . . . If this is the case then a basic flaw exists in all the analyses involving cost of service/property tax revenue analysis and all fund balances which include property tax revenues are indefensible . . . "

Response: Assumptions incorporated into the projected property tax figures are outlined on pages 5-174 and 5-178 of the Revised DEIR, and are reprinted below.

The fiscal consultant indicates that property taxes were estimated by a mathematical model which simulates the limitations imposed by Proposition 13 on assessed property values. The value of the property that does not change ownership is limited to an increase of 2 percent per year in nominal dollars. Annual inflation in excess of 2 percent devalues the purchasing power of the tax received from the property until a change in ownership occurs and the property is reassessed at its sale price. Annual turnover rates were assumed at 10 percent (or once every ten years) for residential properties, 5 percent for commercial properties. No turnover was assumed for industrial properties. An inflation rate of 7 percent was assumed.

Property value on vacant land was assumed to increase from a base average value of \$1,900 per acre to a pre-build present value of \$10,000 per acre when the land changes ownership. A turnover of 5 percent was assumed for vacant properties.

Property tax is limited to one percent of total property value. No deduction was made for Homeowners' Property Tax Relief since the State returns revenue to the County to offset revenue lost to the Homeowners' Property Tax Relief.

The property tax was apportioned to various jurisdictions according to the existing property tax apportionment factors for Tax Rate Area #64001. The property tax revenue was assumed to accrue to the jurisdictions in the year following the incremental increase in property value.



Ongoing revenues for the operation of the Alameda County Library System would be derived from property tax revenues resulting from the development of Las Positas. In Tax Code Area 64001, the County Library System is allocated 5.36 percent of the property tax plus an additional 0.19 percent for the County Library Special Taxing Zone, for a total of 5.55 percent. The library service operating costs and revenues are shown on Table 5.50.

The following paragraphs explain why property tax revenues must be adjusted to keep the entire analysis in constant dollar terms.

The entire analysis was presented in terms of dollars of average purchasing power that exists in February 1982 (i.e., constant 1982 dollars). The rationale for this assumption is that future rates of inflation are extremely difficult to predict and the County's ability to respond to future inflation (e.g., in terms of employee compensation) is equally difficult to predict. An assumption about inflation would merely compound the uncertainty that naturally accompanies any forecast for a future year. In most cases, it was therefore assumed that municipal costs and municipal revenues would respond in the same way as overall price inflation.

Nonetheless, the effects of price inflation could not be omitted from those cases where 1982 purchasing power would not be maintained. In these instances, a 7 percent annual inflation rate was used to convert costs and revenues (i.e., to "deflate" them into dollars of 1982 purchasing power. Three examples illustrate the necessity of deflation calculation.

The first example is the property tax base. Under the terms of Proposition 13, increase in taxable value is limited to 2 percent per year until a change in ownership occurs. The property tax base could keep pace with housing price inflation only if all properties changed ownership once each year. Other examples are motor fuel and cigarette tax revenues. The tax collected for these two revenues is based on the number of "units" sold, rather than the price of the units being sold. Historically, neither of these revenues has kept pace with price inflation.

P.6.2

"What is included in the projected property tax revenue figures shown for the Library Fund in Table 5.50? . . . It appears from the text that current secured and unsecured tax revenues have been included as well as Homeowner's Property Tax relief and Special District Augmentation Funds . . . If this is the case, the County Library does not feel it is realistic to include HPTRS and (SDAF) in projected property tax revenues over the next twenty years

. . . (because) . . . there is every reason to believe that within the next five years neither of these sources will be available to local jurisdictions. Further, even if there is no agreement with this point of view, HPTPS, it appears, has been factored to grow using the same set of assumptions imposed on assessed property values, thereby falsely inflating the figure."

Response: HPTRS (also called HOPTR) is the Homeowners' Property Tax Relief Subvention from the State. This subvention compensates the taxing jurisdiction in the amount of the property tax relocation related to the mandated property tax exemption.

The taxable market value of a unit decreases relative to the real market value while HPTRS fully compensates for the exemption. The separate calculation of HPTRS would have resulted in slightly higher estimates of property tax revenue. Special District Augmentation Funds (SDAF) comprise a portion of the local jurisdiction tax allocation factor. This analysis assumes that SDAF will be returned to the library fund in the same amount as withheld. In other words, it is assumed that the library system has no net transfer either from or to the Special District Augmentation Fund. If the SDAF program is discontinued, the library system would receive the same dollar amount as calculated in this analysis.

6.3

"In light of the difficulties cited (regarding) . . . property tax revenue projections and subsequent fund balances, how will the required 15,000 square foot library be financed? The estimated cost is correct at 2.3 million in 1982 dollars . . . The Report suggests . . . that the Capital Improvement Fund will finance most capital improvements (but also notes that estimated cumulative fund balances indicate that development fees alone may not be adequate, on an annual basis, to finance the capital program) . . . Additionally, it is hinted . . . that operating fund balances could be transferred to cover other deficits (Capital Improvement Fund?) . . . The Library questions projected revenue figures and resulting fund balances."

Response: The Library should review and comment on plans for financing library services that would be included in a Development Agreement that would precede approval of each phase of development. Any uncertainties should be resolved in favor of the Library at that time.

6.4

"Discussions . . . on the advantages of a Special Assessment District and/or Community Facilities District as appropriate



methods of financing capital improvements do not reassure the County Library that required funds will be available for library facility construction by 1990 . . . Without very specific financial structures . . . (to) guarantee availability of required funds . . . built into . . . Plan Approval from the outset . . . Library services . . . will be inadequate and fragmented; . . . an uncompensated burden to provide services will fall most heavily on . . . Livermore; (and) the . . . facilities in Dublin and Pleasanton will experience an increased demand as well."

Response: Refer to the response to comment P.6.3, above.

P.7.0      John Stein, Councilmember, City of Livermore, letter of May 6, 1983

P.7.1      "There is an apparent inherent inconsistency in the proposed plan. A majority of the housing proposed for Las Positas New Town is low and moderate, 85 percent of the total . . . The demographics of those who might desire "affordable housing" include senior citizens, single parent families, single-person households, and low-income families. These families require high levels of social and medical services and public transportation, yet these needs are estimated on the basis of the more affluent existing communities. Why? In the same way sales tax revenue does not reflect a lower income. Why?"

Response: It is expected that housing prices in Las Positas would be comparable to the housing price structure for the Livermore, Pleasanton, and Dublin communities. These areas demand social and health services less than the County-wide average. Similarly, sales tax revenues would reflect the experiences in these comparable areas. See also the response to Comment D.4.7

P.7.2      "The new DEIR shows a cost for the sewage treatment plant and ponds of \$36,594,000 . . . versus \$43,222,000 in the old DEIR . . . Also the land cost for effluent disposal was reduced from \$6,350,000 to \$5,850,000. On what basis were these new lower costs arrived at and by whom? Is there a new report by Lowry and Associates?"

Response: Refer to the response to Comment J.3.1.

P.7.3      "Many other costs given by Wilsey & Ham are quite optimistic . . . have they been compared to other estimates?"

Response: Wilsey & Ham were acting as Professional Engineers when they prepared the cost estimates. Normal engineering practice is



to base cost estimates on comparable experience.

P.8.0 Riho H. Martinson for Orr Property Venture, letter of May 11, 1983

P.8.1 "On page 2-13 of the Summary there is a statement that the Public Land Acquisition Fund fee may be exacted at the time of property subdivision or land sale. The Financial Analysis section . . . appears to assume that the fee will be exacted only at the time of property subdivision. Which is correct?"

Response: The second. The project financing proposal calls for Land Acquisition Fund fees to be exacted at the time a final subdivision map is recorded.

P.8.2 "On page 5-154, beginning on the fourth line, the assumption is made that the Sponsor's advance is to be repaid, with market rate interest. However, elsewhere in the Financial Analysis there are mentions that negative fund balances . . . may result from the proposed financing plan . . . It is our position that a Mitigation Measure should be specifically prepared by the County and adopted to ensure that the Sponsor, not the other present property owners and/or subsequent residents, fund any yearly or cumulative shortfalls in the fund balances of the CSA, County or other affected agencies.

Response: The alternative mitigation measure is acknowledged.

P.8.3 "On page 5-161, the last summarized impact, there is an allusion to the possible legal conflict with the land purchase fee arrangement, vis-a-vis Proposition 13. Is this legal question to be adjudicated? Prior to project approval? It is our view that the Sponsor, not the County, should underwrite the expense of resolving this question."

Response: Legal questions pertaining to the proposed or alternative financing plans would be resolved after actions on the Plan amendment and rezoning and prior to any development.

P.8.4 "It is our view that the Commission should maintain the previously proposed basic financing methods for funding public lands acquisition and capital improvements . . . "

Response: The comment is noted.

P.9.0 Leland E. Stanley, Mary Elise Stanley, letter of May 11, 1983

P.9.1 " . . . we strongly oppose the formation of assessment districts

to finance land acquisitions and capital improvements for the Las Positas Land Co. project. If individuals wish to do this on their own and involve their land only that is their prerogative.

Response: The comment is acknowledged.

P.10.0 Gruen Gruen & Associates, comments on the RDEIR, May 13, 1983

P.10.1 "The proper analysis of fiscal impacts must . . . meet two requirements: 1) it must identify the changes that would occur as a result of the proposed action and 2) it must isolate the changes attributable to the project from changes expected to result from other actions or events . . . (The approach) used in the DEIR is to identify the total changes in costs and revenues that would result. A second approach is to evaluate those changes in terms of net costs and revenues per capita . . . "

Response: The fiscal consultants concur; a fiscal analysis can be defined as the difference between the costs and revenues associated with a proposed action and the costs and revenues associated with an alternative action.

P.10.2 "Page 5-159 (Financial Burden): That carrying costs of infrastructure will have to be borne by developers/builders rather than homeowners is an impact of Proposition 13, not of this project or financing plan, and is common to virtually every new project."

Response: The fiscal consultants maintain that carrying costs of infrastructure, under the proposed financing plan, would be borne by developers/builders rather than homeowners. It is true that this condition is common to virtually every new project, and it is also true that this condition is a result of Proposition 13. However, they note that this is not an impact of Proposition 13 but, rather, is an impact of the proposed financing plan given the realities of Proposition 13.

P.10.3 "Page 5-161 (Mitigation Measures): The . . . burden of capital costs on landowners and . . . the pass-forward of capital costs to residents, financed at private market mortgage interest rates . . . are characteristics of any project built since the passage of Proposition 13. Technically, these impacts of the project are not fiscal impacts, since they do not affect public treasuries, and should not be addressed in this section of the RDEIR. If they are to remain in this discussion, it should be noted that they are impacts of Proposition 13 . . . "

Response: The fiscal consultants indicate that these impacts are not fiscal impacts by definition, if fiscal impacts are limited to public treasuries. However, the consultants' professional approach is to analyze the full cost burden of public facilities financing costs in any fiscal impact analysis. In addition, as was noted in response to comment Q.10.3, above, these are impacts of the proposed financing plan given the realities of Proposition 13.

P.10.4 "Page 5-172 (General Fund): . . . it is unlikely that state funding (state aid for health services) will be tied to the population as of certain date; in contrast, it is more likely that per capita funding levels will decline. The impact of reduced state aid should not be confused with the impact of new population."

Response: The fiscal consultants indicate that, except in years of fiscal crisis, it is reasonable to assume that per capita levels of state aid for health service will remain steady in constant dollars. A reduction in total state aid would cause a decline in the per capita subventions.

P.10.5 "Pages 5-175, 5-177 and 5-183 (Road Fund): The RDEIR states that revenues from taxes on gasoline and diesel fuels are redistributed to counties based in part on the proportion of county wide assessed valuation that is located in the unincorporated county area. Based on this criterion, Las Positas would cause an increase in the County's share of these on a per capita measurement."

Response: Highway users (fuel) taxes are distributed to counties according to Section 2104 and 2106 of the Streets and Highway Code. Section 2104 Subvention responds to vehicle registration, for which population was used as a surrogate. Section 2106 responds to the assessed value in the unincorporated county compared to the assessed value. Las Positas would generate revenues from both Section 2104 and 2106.

P.10.6 "Pages 5-183 and 5-184 (Vulnerability): Most of this section of the analysis tests the impacts of actions other than the development of Las Positas on the County budget. To portray a true and complete picture of the impacts of Las Positas, the analysis would have to project the financial condition of the County given these changes - reduced motor vehicle in-lieu revenue, increase in general government cost equal to allowance



for contingencies and elimination of federal revenue sharing both with and without the project, and then compare the two conditions."

Response: The consultants note that in the vulnerability sections of the fiscal analysis the impacts of reduced State aid and more conservative assumptions regarding required levels of service were used to portray a worst case scenario. Some of these actions would affect the total county, while others might be specific to Las Positas. County-wide (or State-wide) negative impacts would necessitate a reduction in the overall level of services provided to all residents. Project specific impacts would require a reduction in County services below the level of service that would occur without the project.

P.10.7 " . . . The impact of a reduction in state and federal funding for health and welfare programs . . . is not carried through the rest of the section. Las Positas would most likely have little impact on the county's health and welfare costs, because people who can afford to purchase new homes will not qualify for welfare and will generally seek private health care in preference to taking advantage of county services."

Response: The consultants agree that new homeowners do not qualify for public assistance (welfare) and would be unlikely to rely on County health services. However, circumstances can change over time; established Las Positas residents (homeowners and renters) could qualify for public assistance and could rely on County health services.

P.10.8 " . . . '(T)he County would . . . adjust service standards, eliminate services, etc' . . . an examination of past trends in state and federal shared revenue availability would probably indicate that the two vary directly. It is highly unlikely that existing levels of spending would or could be maintained if subventions were cut, just as it was impossible to maintain existing levels of service after Proposition 13 was passed . . . On the other hand, it should be recognized that Las Positas will create a property tax base that is much greater than the existing base in that location and generate greater property taxes per capita than the current average in Alameda County. A very general but realistic comparison of net revenues and costs must recognize that, other things being equal, the level of costs per capita in Las Positas will be equal to or less than the average cost per capita countywide while the average revenue per capita must equal or exceed the average revenue countywide. The development of Las Positas will not in itself cause the reduction of state and

federal subventions, and therefore the impacts of such reduction should not be charged as impacts of the proposed development."

Response: The points raised concern service cutbacks with reduced County-wide revenues, the property tax base relative to the County-wide average, and non-project related impacts. The fiscal consultants note that provision of services responds to revenue availability; a decrease in State or federal shared revenue could cause either implementation of a new revenue source or service cutbacks. Second, the Las Positas project does not match the County's overall tax base balance between residential and industrial uses. And third, reductions in state and federal shared revenues would impact all of the County; the mitigation of this reduction would be the same in Las Positas as County-wide.

P.10.9 "The RDEIR fails to recognize the linkage between occupancy of Las Positas and the construction of new capital facilities . . . If . . . market conditions or other factors inhibit the rate of occupancy and development . . . then the rate of capital improvements construction will also be inhibited because new facilities will not be needed. As the plan is proposed, the maximum exposure on capital expenses would be one year."

Response: The fiscal consultants indicate that the annual capital improvement fund deficits illustrate that there is not a one-to-one linkage between needed capital facilities and occupancy. Many capital facilities cannot be divided into 5- or 10-year increments; rather, the entire facility must be constructed before all of its total users have occupied houses or businesses. Under the proposed financing plan, certain capital facilities will need to be constructed and funded before there is a sufficient revenue base to cover those costs. This linkage between occupancy of Las Positas and the construction of new capital facilities produces the annual fund deficits shown in Table 5.42. The financing for all infrastructure for each phase of development should be in place before the phase is authorized.

P.10.10 "Page 5-153 (Fund Balance): This section fails to recognize the link between development and capital expenditures . . . (C)areful coordination is actually an intrinsic part of the development proposal, just as it is for any large-scale project."

Response: Refer to the response to comment P.10.9.

P.10.11 "Page 5-157 (Vulnerability): Paragraph 1 warns that needs for major capital improvements could come at a time of development



slowdown. This statement reveals a misunderstanding of the proposed financing program. The program is based on the premise that capital improvements will be constructed as needed.

Response: The fiscal consultants do not concur with the comment. They recommend that financing for each phase be negotiated before the phase is authorized.

- P.10.12 "The current analysis (RDEIR) . . . varies the amount of development by phase and by year within each phase. This set of timing assumptions would not necessarily constitute a serious error except that the analysis does not link capital improvement costs to the timing of new development. It therefore shows costs where they would not be incurred - or, more specifically, incurs greater costs than would be warranted for the development schedule shown - and consequently distorts the cash flow and fund balance projections."

Response: The meaning of the comment is not clear. Refer to the response to Comment P.10.11 for the position of the fiscal consultant on financing of capital improvements.

- P.10.13 "Page 5-151 (Schools): . . . A more cost-effective approach to providing school facilities (during the first several years) . . . would be to provide portable classrooms which can be rented from the State at low cost, and defer school construction until greater numbers of students are present."

Response: Agreed. However, as discussed in the Revised DEIR, this approach may not be consistent with the objectives and requirements of the District. The problem would be eliminated if the decision is made to negotiate project financing for the entire phase before each phase is approved.

- P.10.14 "Page 5-155 (Table 5.41, Public Land Acquisition Costs and Revenues): The conservative . . . assumption would be that land fees are collected in even increments. This table shows them in uneven increments . . . Evening out the revenue stream does not change the net condition of the fund: annual deficit and gain amounts are altered, but the cumulative balance is still always positive."

Response: The project description analyzed specified build-out on a phase-by-phase, and not a year-by-year basis. To convert the four phases to twenty years, two conservative assumptions were made by the fiscal consultants: first, it was assumed that the total residential construction in a given phase would be evenly



build-out over the five years of take phase. Second, it was assumed that non-residential construction would take place in years "2" and "4" of each phase. The second assumption causes the "unevenness" in land fee collection.

P.10.15 "Page 5-156 (Table 5.42, Capital Improvement Fund): The RDEIR incorporates arbitrary assumptions about the timing of development costs and revenues that appear to be inconsistent with each other."

Response: Refer to the response to Comment P.10.14.

P.10.16 "Page 5-162 . . . If the payback provision were eliminated, the per unit cost of the land and development fees would be reduced by about six percent, or \$500."

Response: The comment is acknowledged and is confirmed by the fiscal consultants.

P.10.17 "Page 5-172 . . . The analysis of health service costs . . . fails to indicate why average health costs for Las Positas residents will be even half the average countywide per capita amount. Households with incomes sufficient to buy new homes are likely to prefer - and are able to afford - private medical care. This assumption combined with the attribution of increased net costs for health service to new residents of the county has significant impacts on the fiscal impact analysis . . . If the health costs assumed were only 20 percent lower . . . the annual cash flows would turn positive in 1992-93 . . . and the cumulative fund balance would turn positive by 1999-2000."

Response: The fiscal analysis assumes that Las Positas residents would require half the per capita County-wide level of health service. Opinions vary as to what percent of County-wide health costs should be used. The fiscal consultants indicate that fifty percent represents a fair estimate.

P.10.18 "Page 5-173 (Table 5.47) It is not clear why the revenue from property transfer taxes varies so widely from year to year. It is also unclear why revenue from cigarette taxes declines after 1999-2000."

Response: Real property transfer tax revenue varies each year depending on project phasing. The fiscal analysis has assumed that commercial property would be developed in lumps. Cigarette tax was estimated to decline in real dollars because the per capita cigarette consumption is decreasing and the tax on

cigarettes is fixed rather than responding to the price of cigarettes.

- P.10.19 "Page 5-174 (General Fund): There is no indication that property tax projections recognize reassessment upon sale of property nor, if they do, by how much."

Response: Estimates of property taxes were simulated using the McDonald and Associates computer model. This model allows an increase in taxable value (in nominal dollars) limited to 2 percent (Proposition 13) plus reassessment upon sale of property. Upon resale, property is reassessed to its full value (estimated in constant dollars at its original sale price).

- P.10.20 "Page 5-158 (Table 5.43): The table appears not to recognize all the elements of the financing program. For example, while developers would pay back the sponsors advance as part of the development fees, they would have an interest-free loan on that money and would in turn pass it forward to home purchasers. In fact, all fees would be passed forward. This situation in which funding of capital facilities is provided by private rather than public sources is an impact of Proposition 13."

Response: The fiscal consultants acknowledge that the financing situation is a result of Proposition 13. However, they note that recognition of the existence of a fiscal burden may be an important point of information to appointed and elected decision makers. They also note that the financial burden may be passed back to the landowner, in the form of lower land values.

- P.10.21 "The table (5.43) also states that projected cash flow deficits in the Public Land Acquisition Fund and the Capital Improvements Fund could require revenue from other public agencies. In fact there are no deficits projected in the Public Land Acquisition Fund, and deficits in the capital improvement fund are limited to one year's duration."

Response: The fiscal consultants indicate that Table 5.43 should be corrected to eliminate the following text, applicable only to the Public Land Acquisition Fund: "Projected cashflow deficits could require other revenue from public agencies", and "If Alameda County general fund revenue is used to offset cashflow deficits, County residents will, in effect, subsidize Las Positas."

They indicate that this text would still apply to the Capital Improvement Fund. The Public Land Acquisition Fund has annual

deficits but not cumulative deficits, and would therefore not require assistance from other agencies. The Capital Improvement Fund, on the other hand, has both annual and cumulative deficits; annual deficits are revealed in seven of twenty years, and cumulative deficits are shown in seven of twenty years. These cumulative Capital Improvement Fund deficits would require revenue from other public agencies or other sources if the proposed project were to proceed as described. The fiscal consultants do not, however, anticipate any financing from other public revenues. They propose that a Development Agreement for each phase should provide adequately for required sources of financing.

P.10.22 "Page 5-171 . . . The first identified impact, potential fund balance deficits, is not substantiated by the preceding analysis."

Response: The fiscal consultants indicate that the statement "potential fund balance deficits ;during the first few years of project buildout" refers to the discussion on page 5-168. Under Section a., Fund Balance, page 5-168, the fund balance deficits are discussed.

"Table 5-46 also shows the fund balances that would develop from the projected operating costs and revenues of the Las Positas CSA. Any potential annual CSA operating budget deficits would be offset by a portion of the Sponsor's Advance set aside as a contingency fund for this purpose. Table 5.46 shows the potential for deficits in 1985/86 (\$592,000) and 1986/87 (\$81,000). Hence, an amount equivalent to the sum of these deficits would be required in the contingency fund."

P.11.0 Federal Communications Commission Field Operations Bureau, San Francisco Region, letter of May 13, 1983.

P.11.1 "Costs of such an effort (relocation and construction of a new monitoring site) would be at least one million dollars (1983) not including the cost of land at new site or relocation of employees. The funds would have to be provided in advance so that a new site is constructed and employees relocated prior to disposal of the current site. Federal Property Management Regulations . . . (do not) address sale, lease back, and replacement using funds from sale to a non-government entity and funds from land sales are usually deposited in the Government's General Fund. Any such action would require the concurrence of the Office of Management and Budget, the Congressional Oversight Committee, and possibly special legislation to have such funds remain in control of the Commission . . . The County may wish to



increase the Sponsor's advance by 1.5 million dollars to fund purchase of the . . . (FCC) property and to cover associated land transfer and development fees."

Response: The comment is noted. Refer to the responses to Comments P.1.1 through Q.1.3.

P.12.0      Livermore Area Recreation and Park District, Letter of May 13, 1983

P.12.1      "The Board does not concur with the proposal that so called 'surplus property tax revenues' be directed or used to reduce certain developer costs or user fees." . . . Recommend that the project sponsor be required to revise his proposal to reflect this fact."

Response: The proposed use of "surplus property tax revenues" is evaluated in the fiscal section of the RDEIR (p. 5-157), where the economic consultants advise that "even if such a revenue surplus could be produced. . . the likelihood of future Board of Supervisors transferring "net" revenue from the General Fund to a County Service Area is extremely low. . . It is unlikely that a proposal to invest in infrastructure for new residents. . . would successfully compete with other County demands for increasing scarce revenues." Refer to the response to Comment F.1.2.

P.12.2      The District does collect user fees for program purposes and these monies are used to offset some of the costs for program activities. Such fees are not used for park maintenance purposes. The statement in the DEIR that LARPD provided the \$1.00 per capita estimate is not correct . . . Recommend that the project sponsor be required to revise the revenue projections so as to bring them into line with current District practices concerning user fees."

Response: Noted. User fees are used for partially offsetting the costs for program activities. This revenue source has been deleted from revenues available to finance park maintenance ( See Table 5.57-Revised).

P.12.3      "The Board does not agree with the total revenue projections that reflect a \$13,080,000 'surplus' over the term of the project for several, one of which was discussed . . . under user fees. Other reasons are as follows: . . . Only about 50% of the District's share of the . . . property tax levy goes into the Special District Augmentation Fund (SDAF) for allocation as deemed appropriate by the Board of Supervisors. The study assumes that

Table 5.57-Revised  
LIVERMORE AREA RECREATION AND PARK DISTRICT ANALYSIS  
LAS POSITAS GENERAL PLAN AMENDMENT CONSIDERATION  
(All figures are in constant February 1982 dollars)

YEAR	O & M COSTS GROUNDS (1)	PROPERTY TAX REVENUE	BALANCE AVAILABLE TO FUND OTHER ACTIVITIES	
			ANNUAL	CUMULATIVE
1985/86	\$ 58,000	\$ 10,400	\$ -48,600	\$ -48,600
1986/87	\$ 118,000	111,600	- 6,400	-55,000
1987/88	\$ 177,000	271,000	94,000	39,000
1988/89	\$ 236,000	368,900	132,900	171,900
1989/90	\$ 295,000	518,700	223,700	395,600
SUBTOTAL	\$ 885,000	\$ 1,280,600	\$ 395,600	
1990/91	\$ 354,000	\$ 698,300	\$ 334,300	\$ 729,600
1991/92	\$ 413,000	758,700	345,700	1,075,300
1992/93	\$ 472,000	926,100	454,100	1,529,400
1993/94	\$ 531,000	1,009,200	478,200	2,007,600
1994/95	\$ 531,000	1,170,700	639,700	2,647,300
SUBTOTAL	\$ 2,301,000	\$ 4,147,800	\$ 1,846,800	
1995/96	\$ 590,000	\$ 1,248,800	\$ 658,800	\$ 3,306,100
1996/97	\$ 649,000	1,328,500	679,500	3,985,600
1997/98	\$ 708,000	1,516,200	808,200	4,793,800
1998/99	\$ 767,000	1,590,700	823,700	5,617,500
1999/00	\$ 826,000	1,774,200	948,200	6,565,700
SUBTOTAL	\$ 3,540,000	\$ 6,779,900	\$ 3,239,900	
2000/01	\$ 885,000	\$ 1,844,300	\$ 959,300	\$ 7,525,000
2001/02	\$ 944,000	1,906,700	962,700	8,487,700
2002/03	\$ 1,003,000	2,163,300	1,160,300	9,648,000
2003/04	\$ 1,062,000	2,222,200	1,160,200	10,808,200
2004/05	\$ 1,062,000	2,472,700	1,410,700	12,218,900
SUBTOTAL	\$ 5,253,000	\$ 9,643,700	\$ 4,390,700	

Note:

- (1) Net cost of program activities and cost of park facilities maintenance are not included.

LARPD will receive 100% of LARPD's 13.28% of property tax revenues derived from tax code area 64001. This is not factual. Actual experience over the last few years reveals that LARPD eventually receives about 90% . . . This 10% annual short-fall translates into a reduction of some \$1,100,000 in total revenue over the 20 year life of the project."

Response: Table 5.57 has been revised to reflect a reduction of property tax revenues by 10 percent.

- P.12.4 "The study addresses only park maintenance costs. Not factored into the operation and maintenance costs are monies needed to operate and maintain the facilities and public buildings . . . (recreation centers, tennis courts, swimming pools, ball fields, etc.).

Response: The analysis addressed park grounds maintenance costs only. Park facilities maintenance costs were not available at the time the responses to comments were prepared.

- P.12.5 "Also omitted are monies for personnel staffing, administrative costs, equipment needs and supplies and the monies needed to provide program activities for the estimated 45,000 residents.

Response: Program activity costs would be only partially offset by user fees. Actual costs were not available at the time the responses to comments were prepared.

- P.12.6 "The Board . . . recommends that the project sponsor . . . address the revenue and cost projections as they relate to the provision of park and recreation services so as to reflect all facets . . . not just park maintenance costs.

Response: Not all costs were available at the time the responses to comments were prepared. The revised revenue analysis is shown on Table 5.57-Revised.

- P.13.0 Metropolitan Transportation Commission, letter of May 13, 1983

- P.13.1 "A number of roadway improvements are shown to be essential. Whereas the financing plan in the DEIR proposes means of financing them, a substantial part of the finances depend on sources outside the project, and the availability of such financing is highly uncertain."

Response: The comment is acknowledged A transportation system



financing plan would need to be prepared prior to project implementation.

14.0 Roland Mayne, Executive Officer, Local Agency Formation Commission, letter of May 11, 1983.

14.1 "On Page 5-154 . . . it is stated "for the analysis, it was also assumed that market rate interest would be paid on the advance." However, on Page 5-155 and 5-156, Tables 5.41 and 5.42 there are no funds included in either of these charts for payment of interest for the sponsors advance . . . "

Response: The fiscal consultants respond that the sentence "for the analysis, it was also assumed that market rate interest would be paid on the advance" should be changed to read "for the analysis, it was also assumed that interest would be paid at a rate of interest not to exceed the rate of general price inflation; the result is a Sponsor's Advance payback equivalent to the Sponsor's Advance, in constant dollars."

14.2 "The report indicates that fire protection would be provided through the Structural Fire Fund. The . . . Fund was established to provide a level of service for rural fire protection (and not) to provide an urban area service. All calculations and information on the provision of fire services should be included as a part of the CSA rather than the other County funds."

Response: The comment is acknowledged. On page 5-178 of the Revised DEIR it is stated that "the Structural Fire Fund, in fact, applies only to rural unincorporated areas not in an urban-level fire protection district. It is therefore an inappropriate funding source at Las Positas." Fire protection was analyzed under the auspices of the Structural Fire Fund only because that was the method outlined in the project as proposed. The consultant's mitigation measures avoid the inappropriate use of the Structural Fire Fund. This discussion is included on page 5-190 of the RDEIR.

14.3 "The report should include the impact of a potential County provision of urban services to this area (which) would be chargeable against the CSA. This would possibly at a minimum include police services and animal control."

Response: In Section 5.8, page 5-190, the fiscal analysis proposes that a "straightforward way to eliminate the estimated General Fund deficit would be to finance all or part of the

Sheriff's services with a special tax levied at Las Positas. A Community Facilities District could be used as the governmental mechanism for imposing such a tax."

P.15.0      City of Livermore, letter of May 16, 1983.

P.15.1      " . . . the entire fiscal analysis is predicted upon the unverified capital cost estimates made primarily by the developer itself. CEQA requires that important information such as this which is provided by the project proponent and included in the EIR be subjected to full and independent scrutiny."

Response: Capital cost estimates for the proposed Las Positas County Service Area were provided by Wilsey & Ham and Lowry & Associates, acting in their capacity as professional engineers. Some capital cost estimates were provided by public agencies providing services.

P.15.2      "The analysis fails to provide accurate and complete information about costs imposed by Las Positas on Livermore."

Response: Refer to responses to Comments P.15.2a, 15.2b, and 15.2c, below.

P.15.2a.    " . . . some of the estimated costs to Livermore are inaccurate. For example, the analysis seriously underestimates the cost to Livermore of servicing Las Positas Library needs . . . (cited) mistakes should be noted in the DEIR's analysis of library impacts upon Livermore . . . The DEIR should analyze the fiscal impacts upon the City using the corrected cost estimates set forth . . . and assuming that no State subventions are received."

Response: Table 5.59 shows the revised cost impact analysis for the City of Livermore Public Library.

P.15.2b.    "The County (library facility in Las Positas) will mitigate the impact of continued development, but it will not make Las Positas independent of the Livermore public Library system for approximately another five years. Difficulty in calculating Phase II costs does not mean they are non-existent, and such costs should be included in the DEIR's analysis."

Response: Table 5.59 (revised) reflects a continued patronage of the Livermore Public Library during Phase II.

Table 5.59 - New

COST IMPACT ANALYSIS: CITY OF LIVERMORE PUBLIC LIBRARY  
LAS POSITAS GENERAL PLAN AMENDMENT CONSIDERATION  
(All figures are in constant February 1982 dollars)

YEAR	TOTAL POP	PER CAP COST @ \$4.25	* PERSONNEL * COST @ \$27,000 *	ADDED POP	ONE TIME COST @ \$43.45	* TOTAL COSTS
1985/86	2,329	\$ 9,900	* \$ 27,000 *	2,329	\$101,200	* \$ 138,100
1986/87	4,657	\$ 19,800	* \$ 27,000 *	2,326	\$101,100	* \$ 148,100
1987/88	6,987	\$ 29,700	* \$ 27,000 *	2,332	\$101,300	* \$ 156,000
1988/89	9,313	\$ 39,600	* \$ 27,000 *	2,326	\$101,100	* \$ 167,700
1989/90	11,642	\$ 49,500	* \$ 27,000 *	2,329	\$101,200	* \$ 177,700
SUBTOTAL PHASE I		\$146,500	* \$135,000 *		\$505,900	* \$ 789,400
1990/91	13,939	\$ 59,200	* \$ 27,000 *	2,297	\$ 99,800	* \$ 186,000
1991/92	(1)	\$ 14,800	* 6,800 *		0	* \$ 21,600
1992/93	(1)	\$ 14,800	* 6,800 *		0	* \$ 21,600
1993/94	(1)	\$ 14,800	* 6,800 *		0	* \$ 21,600
1994/95	(1)	\$ 14,800	* 6,800 *		0	* \$ 21,600
SUBTOTAL PHASE II		\$118,400	* \$ 54,200 *		\$ 99,800	* \$ 272,400

NOTE:

- (1) In 1991/92, a permanent library facility would commence service on the Las Positas project site. Cost impacts on the City of Livermore Public Library would be substantially reduced, but not eliminated. Approximately 25% of the former patrons would continue to use the Livermore facilities. No additional volumes (one-time cost) would be added.

Source: McDonald & Associates



- P.15.2c. "The DEIR fails to provide any analysis whatsoever of costs in other areas such as fire, police, and road maintenance, all of which will be affected by Las Positas . . . it is likely that Livermore will be called upon to provide (fire service in the years before Las Positas has its only full fire service) . . . the costs of this service should be estimated and analyzed in the DEIR."

Response: Las Positas would have one on-site fire station at the beginning of Phase I. This station would be staffed by a three-person engine company. Execution of Mutual Aid Agreements would require responses to multi-alarm fires, and serious police matters. The Livermore Police Department may therefore receive emergency first response calls from Las Positas residents as well as backup response requests. Livermore residents would in turn receive backup from the Sheriff mobile patrol in Las Positas. Off-site road impacts were shown in Table 5.37 of the Revised DEIR.

- P.15.3 ". . . the information provided in the fiscal analysis is not correlated with other parts of the DEIR which are directly affected by fiscal matters, such as affordability of housing (which in turn affects the extent to which Las Positas employees reside within the project and the extent to which the generated traffic is internal or external)."

The fiscal consultants were not asked to prepare an assessment of the marketability of the project, or of the affordability of proposed housing. Refer to the response to Comment D.4.5

- P.15.4. ". . . the DEIR should discuss the possibility of teaming up with other local fire departments to provide some type of consolidated service.

Response: The EIR discusses typical mutual aid arrangements in order to assess project impacts on other local fire departments. Although the concept of a consolidated fire protection service for the Livermore-Las Positas area, or for the entire Livermore-Amador Valley may have merit it is beyond the required scope of the current project EIR to develop/assess a serious proposal for such an arrangement.

- P.15.5. "The DEIR should . . . analyze the design and costs of measures to ensure code enforcement, which measures could render construction costs higher than estimated."

Such costs are factored into estimates for major capital improvements. Table 5.24, page 5-52 of the RDEIR, indicates projected housing sales prices, not construction costs. These are proposed to be competitive with other residential projects in the Livermore-Amador Valley. Changes in building code requirements would be expected to apply to all residential projects, causing a uniform increase in construction costs. These could be absorbed by the buyer, or if necessary, be offset by lowered land purchase prices or reduced profits to the developer/builder.

- P.15.6. " . . . the DEIR's fiscal analysis omits any discussion of the impacts upon Livermore's police service caused by Las Positas residents."

Response: The Livermore Police Department may receive emergency first response calls from Las Positas residents as well as backup response requests. The County Sheriff's Department would, in exchange, provide backup to Livermore from the mobile patrol in Las Positas.

- P.15.7. "The DEIR's analysis of affordable housing should include these potential fiscal impacts. Also the impacts of these charges on the costs of Las Positas housing, on traffic patterns, and on other environmentally significant matters should be analyzed.

Response: Per unit capital and operating costs are indicated in the EIR. Refer to the response to Comment D.4.5.

- P.16.0 Hiro Fujimoto, Chief Deputy Auditor, Alameda County Office of the Auditor-Controller, letter of May 13, 1983

- P.16.1 "Clarification as to the extent of the County's liability to repay the (\$14,000,000) loan would appear to be essential. Can the repayment be made the exclusive obligation of the CSA, or will the County be contingently liable regardless of what the terms of the loan provide?"

Response: The economic consultant does not concur with the recommendation that an obligation be accepted to repay an advance. Other mechanisms (e.g., the use of bonded debt, even if the purchaser of last resort for that bonded debt is the proponent) exist to eliminate the need for repayment agreement. The use of a bond would place the financing responsibility on the property and would eliminate the question as to who (original sponsor or

ultimate developer) should receive the repayment.

P.16.2 "Clarification may also be needed as to what legal requirements may be applicable to the incurrence of such long term debt by a CSA or County. . . "It appears clarification is needed in each of the (school construction) financing alternatives as follows:

1. Proposed Fee Financing: Additional funds will be required in seven of twenty years to meet capital improvement costs. The source of the additional funds need to be determined.
2. Special Assessment District: Has this method ever been used to finance school construction in California? If not, legal clarification may be desirable.
3. Community Facilities District: The provisions of the act providing this new financing mechanism are untested. The question of County's contingent liability in the event of default is a concern."

Response: 1. Adequate financing for each phase should be negotiated before the phase is approved.

2. A conventional special assessment (e.g., the 1911 Act or the 1915 Act) is not available for financing schools or other facilities that are for the general welfare. The newly authorized Mello-Roos Community Facilities District currently provides a vehicle for school financing.

3. The fact that the Community Facilities District Act is untested and has not been validated by any court is acknowledged. The question of the County's contingent liability would need to be raised with a bond counsel. However, the Mello-Roos Community Facilities Act which has many parallels to the Improvement Bond Act of 1915 does not make any reference to any contingent liability in the event of default.

P.16.3 "Property tax and property transfer tax revenue amounts shown in Table 5.47 appear reasonable in relation to projected development. A slowdown of development will cause a proportionate decline in the annual growth of both taxes. We did not review any of the other sources of revenues included in the table."

Response: The comment is acknowledged. No further response is required.

P.16.14 "Establishment of special assessment districts or the levy and collection of benefit assessments and special taxes with property



taxes will create additional administrative workload on the Auditor-Controller's Office. At post-buildout, more than 18,000 units would be charged for police and fire protection, road maintenance and street lighting."

Response: The comment is acknowledged. Should County Service Area (CSA) costs prove to be higher than those projected, user charges would have to be adjusted as necessary.

P.17.0 Residents of Bel Roma Rd., letter of May 14, 1983.

P.17.1 "Bel Roma area residents feel strongly that proposals should be made by Las Positas Land to assure that we do not lose property values. That would enable us to replace our ranchette lifestyle in another suited area of Alameda County."

Response: Such proposals have not been made to date.

P.17.2 (1) "Who will be held responsible for the project if it fails? (2) Without complete buildout as planned, the new homeowners and businesses will not generate enough revenue to support necessary services. (3) It seems mandatory, therefore, that the county insist on some kind of performance bond so that Alameda County taxpayers as well as Las Positas citizens are not held accountable for (the) developer's default."

Response:(1) As proposed, major capital improvements would be phased to match requirements of increments of residential, commercial and industrial development. During any phase, if this development did not occur as anticipated the primary impacts would be on the developers/builders, who would need to carry, as a part of their construction debt, their contributions to the payback of the Sponsor's advance, and to the Public Land Acquisition Fund, and Capital Improvement Fund for that phase. These carrying costs could, in turn, be added to the price of new homes and commercial/industrial space. unless they are absorbed by the developer/builder.

Potential fiscal impacts on public and private sectors are generally summarized in Table 5.43 of the RDEIR, page 5-158: the County would be impacted if Alameda County General Fund Revenue is used to offset cashflow deficits; county residents would, in effect, subsidize the development; projected cashflow deficits for capital improvements (not land acquisition) could require other revenue from public agencies; costs to developers could be

added to the price of new homes and commercial/industrial space; developers/builders would need to contribute to the Capital Improvement Fund, which would increase their construction debt; developers/builders would also pay back the sponsor's advance as part of development fees; existing landowners would be required to contribute approximately half of the land sale price to the public land acquisition fund; the portion of the capital costs that cannot be passed forward to future residents (or developers/builders) could also be deducted from land sale prices. The project sponsor would lose interest income (above inflation) on the advance funds.

(2) Complete buildout of the project would not be as critical as complete buildout by phase. If slowdowns occurred during any phase, builders/developers would be impacted, as noted above; user charges to residents and businesses would also need to be raised to cover operating and maintenance costs.

(3) A Development Agreement, negotiated prior to each phase, could also be used.

P.17.3 "No payback of the minimum \$10 million must be a condition of acceptable of this proposal."

Response: This has not been proposed.

P.17.4 "Since this plan will affect taxpayers countywide, perhaps it should be put to the general electorate in November for a feeling about development-supportive services."

Response: The comment is acknowledged. No further response is required at this time.

P.18.0 Mel Hing, County Administrator, letter of May 18, 1983

P.18.1 "The proponent outlines the use of a \$14 million advance, the creation of a Capital Improvement Fund, and a Public Land Acquisition Fund. The proposal needs clarification. It would be helpful if the proponent could clarify how these funds and cash advances are to work in sufficient detail to enable the County to determine if the proposal is practical and legal. A determination will then have to be made about the risk this project poses to the County."

Response: Noted. Additional clarification of the proposed financing plan has not been submitted.

P.18.2 "The County would be best served if there were a vehicle to assure that all property owners were bound by the proposal."

Response: We concur. This could be stipulated in the provisions and conditions of the zoning reclassification, applicable to the entire area, or by phase.

P.18.3 " . . . it appears the County would be vulnerable if the project costs and revenues were not achieved."

Response: This is consistent with findings in the RDEIR.

P.18.4 "The state of the County's current financial situation is such that it may be financially burdensome to proceed with the project without specifically determining the financial impacts."

Response: The conclusion that the project would be financially burdensome to the County is also reached in the EIR. More specific assessment of the project would not contradict this conclusion.

P.18.5 "Unless major changes are provided with the proponent's proposal, these funds (County General Fund, Roads, Library and Structural Fire) will incur substantial deficits which will not be overcome in future years . . . "

Response: The comment is acknowledged and confirmed. The Revised DEIR includes the fiscal consultants' recommendations for mitigating these deficits.

P.18.6 "The proponent is suggesting a County Service Area to provide the bulk of services to the development. The financial consultant is proposing a number of alternatives . . . However, no single proposal is recommended . . . "

Response: The alternatives are proposed as mitigation to potential impacts of the financial/administrative plan proposed by the project sponsors. It is not the function of the EIR to make a final recommendation on the project or on components of the project.

P.18.7 "The question needs to be addressed as to which form of government is more capable of providing urban services - a city or county."



Response: This question does not have a general answer. There are numerous instances where counties in California are providing urban services adequately and efficiently. Nonetheless, a policy decision could be made that municipal services should be provided exclusively by municipalities.

- P.18.8 "The alternative approach outlined by the financial consultant to have the County purchase all public use and non-developed land through a (CSA) . . . would appear to place the County in the position of actually managing the development project . . . The County appears to face potential risks without any commensurate benefits . . . (and) the County's ability to successfully manage all aspects of the project is a new role, basically . . . untested . . . (and is) the traditional role of private developers."

Response: The role of the County as an active participant in the development process is acknowledged. The risk can largely be eliminated by a carefully negotiated Development Agreement that provides for financing and for contingencies in advance of the approval of any phase.

- P.18.9 "The suggested \$83,000 to provide for administration of the County Services Area seems somewhat understated, given the expectations and complexities associated with managing this district."

Response: The comment is acknowledged. Should County Service Area (CSA) costs prove to be higher than five percent of total CSA operating costs, user charges would have to be adjusted accordingly.

- P.18.10 (Plan amendment, rezoning, and creation of a CSA) . . . are subject to a referendum . . . (and) an election may have to be held . . . (A)n election might be beneficial initially to determine the voters' views on this development project."

Response: The comment is acknowledged. No further response is required.

- P.18.11 (1)" . . . property taxes have been adjusted for a 7% inflationary growth as well as phasing the development itself. This 7% inflation factor is not consistent with maintaining revenues and costs at the 1981 level . . . (2) Secondly, sales taxes seem to be overestimated by a minimum of 4% . . ."

Response: (1) Refer to the response to comment P.6.9 for a detailed explanation of the property tax calculation and constant

dollar approach.

(2) The sales tax analysis was based on the following assumptions: 1) 16 percent of all taxable sales generated by Las Positas residents would occur within Las Positas; 2) 4 percent would occur in other unincorporated areas of the County; 3) 50 percent would occur within incorporated portions of the County (Alameda County would receive 5 percent of the sales tax revenue from those taxable sales); and 4) 30 percent would occur in other counties.

P.18.12 "Motor Vehicle In-Lieu taxes . . . may be overstated . . . (first because) the per capita rate . . . of \$13.96 is not based on the budgeted amount; the rate is equivalent to \$12.09 per capita . . . (and second, because) the . . . analysis does not recognize that the state has been cutting the . . . In Lieu funds . . . (and is) proposing to continue this withhold in future fiscal years . . . "

Response: The fiscal consultants note that Motor Vehicle In-Lieu taxes (vehicle license fee), cigarette tax and Business Inventory Tax Relief subventions have been deleted from the 1983/84 State budget. It is questionable whether this subvention will resume in periods of better fiscal standing. A revised revenue analysis would show a cumulative reduction of \$6,997,000.

P.18.13 "The costs assumed by the proponent of the project's impact on the General Fund during buildout appears to be understated by \$30.53 per capita. Our 1981-82 analysis indicates . . . a total overall per capita cost of \$257.65. As contrasted with the report's costs of \$227.12, a variance of \$30.53 exists . . . The resulting impact of the revenue analysis and total cost analysis on a per capita basis as indicated in Tables 5.47 and 5.48 appears to increase the County's liability for maintaining existing service levels . . . "

Response: The difference between the County's analysis and the McDonald & Associates analysis is reflected in the differences in assumptions regarding public assistance (welfare) and health net costs. The fiscal consultants assumed that project residents would generate less demand for these services than the County-wide average, while the County's analysis assumes that health and public assistance services would be required in the same proportion as the County-wide average.

P.18.14 "The suggestion on page 5-180 that off-site commercial and industrial development could produce off-site revenue to the County which could be used to offset General Fund deficits . . . appears speculative and an approach which the County should

refrain from utilizing to justify a project of this magnitude."

Response: The comment is acknowledged.

- P.18.15 "Under the General Fund vulnerability analysis on Page 5-183 and 5-184, the financial consultant indicates a worst case scenario as depicted in Tables 5-53 and 5-54. The County believes that this is not a worse case scenario, but is, in fact, realistic financial data from the 1981-82 budget with adjustments for Revenue Sharing funding, Motor Vehicle In-Lieu revenues, and Health and Social Services costs . . . The County's actual per capita costs will increase beyond the budgeted level . . . (because) (1) The State is adjusting current year Motor Vehicle In-Lieu fees to reduce the figure from the budgeted amount, and (2) the costs of a Social Services and Health program on a net basis will be substantially greater than anticipated in the budget . . . (T)he proposed development project would (therefore) proportionately increase the County's financial problems unless alternatives are proposed which would mitigate the problem."

Response: The consultants note that each of the above-mentioned revenue reductions are non-project impacts. The mitigation to the problem would be a County-wide mitigation.

- P.18.16 "While it is clear that a benefit assessment approach (for Sheriff's services) would help to mitigate the financial impact on the County's General Fund, it is unclear at this time whether it would be sufficient to offset the entire shortfall . . . (T)he approach to include more industrial or commercial land is not developed in sufficient detail. The County and the proponent need to review this proposal to determine if it is practical and would result in alleviating the financial problems."

Response: The fiscal consultants note that all adverse impacts to the County General Fund could be mitigated merely by setting the assessment at the appropriate level.

- P.18.17 "The proposal does not address animal control services."

Response: Animal control services were included in the cost grouping - "General Government", shown in Table 5.48. Animal control service represents \$3.17 per capita of the \$142.15 per capita category total.

- P.18.18 ". . . there are not sufficient funds (in the Road Fund) to develop an adequate road system for the project under the



proponent's proposal. This summary is shown on Table 5-49. There is not sufficient detail from the original proposal to determine how this financial problem would be resolved."

Response: The fiscal consultants propose that the full cost of road maintenance could be financed by assessments at the start of each phase.

P.18.19 " . . . it is unclear whether the proponent agrees with (the proposal for establishment of a road maintenance benefit assessment district) . . . Also, it is unclear what the overall impact will be with this . . . assessment district to the financial feasibility of the project, since there is not a cohesive proposal specifically setting forth those areas which are to be funded . . . Moreover, will this funding be adequate to maintain the road system."

Response: The proponent has not commented on the road maintenance benefit district. The fiscal consultants recommendations on a cohesive financing proposal are presented separately from the EIR.

P.18.20 "The proposal does not provide sufficient information to identify offsite road needs."

Response: A revised analysis of offsite road costs has been prepared, based on the revised Transportation Analysis, included as an Appendix to this EIR.

P.18.21 "The provision for fire services . . . through the Structural Fire Fund . . . is not acceptable since the . . . Fund is not intended to provide municipal fire services."

Response: Refer to the response to Comment P.14.2.

P.18.22 "The proposal provides for the acquisition of fire equipment but does not provide personnel to operate the equipment during the initial years. The reliance on mutual aid as a solution to this problem may not be practical . . . "

Response: Fire protection costs are discussed in two sections of the Revised DEIR: p. 5-148 (Capital Costs and Financing) and p.5-180 (Alameda County General Government). The two sections address capital and ongoing costs, respectively. Table 5.39 shows the purchase of equipment and the construction of stations. Table 5.51 shows Phase I ongoing fire protection costs as \$450,000 annually. This cost is for the personnel for a three-person engine company.

- P.18.23 "The financial consultant recommends . . . a community facilities district . . . (A)t least two issues . . . require clarification: the first, whether the proponent agrees with this approach, and secondly, to what extent does this alternative impact the overall economic viability of the project?"

Response: Project sponsors have not commented on the CSF alternative. The fiscal consultants conclude that the use of a Community Facilities District would enhance the economic viability of the project, as compared to the alternative of use of development fees paid in advance of construction. Once the market at Las Positas has proved itself, infrastructure could be financed from tax-free municipal bonds with a savings accruing to the original landowners or to the homebuyers.

- P.18.24 "The County must be concerned about the need for Countywide services which this development will impact including: crime laboratory, central identification, municipal court and ancillary support costs . . . Additionally, capital project needs will be a concern, including the need for a government center, jails, court complex. The proposal does not address these issues."

Response The fiscal consultants indicate that each of these cost items are included in the cost category "General Government", shown in Table 5.48.

- P.18.25 "(Regarding) the \$14 million cash advance . . .
- a. What is the County's liability or contingent liability to repay the \$14 million loan?
  - b. Will the \$14 million be repaid with interest, and, if so, what is the financial impact to the project and the County?
  - c. Should not the sponsor's advance be large enough to mitigate all Capital Improvement Fund negative cash flows?"

Response: The economic consultant does not concur with the concept of a repayment of a development fee. There are serious questions as to who should in fact receive any such repayment, since there is every possibility that the project would be sold as soon as entitlements to develop have been received. Instead, the financing plan for Phase I should be self-contained. Also refer to responses to Comment P.14.1.

P.18.26 "The issue of school construction appears to need clarification since it is uncertain how the funds would be raised."

Response: Refer to the responses to Comments P.1.1 through P.1.3. The fiscal consultants propose that a Development Agreement be established which would include provisions for financing school facilities required for each phase.

P.18.27 "Is a special assessment district a viable alternative to finance schools?"

Response: The fiscal consultants note that a conventional special assessment district is not available for financing schools or other facilities that are for the general welfare. The newly authorized Mello-Roos Community Facilities District would appear to be available for this purpose.

P.18.28 "The dependence of special assessment districts will directly impact the County's property system, including staffing in the Assessor's, Auditor's, and Tax Collector's Offices. No assessment has been made of this impact."

Response: Impacts of the project on all of the departments that are cited have been included in the fiscal impact analysis in the EIR.



Q.        Federal Communications Commission Monitoring Station

Q.1.0      Federal Communications Commission Field Operations Bureau, San Francisco Region, letter of May 13, 1983.

Q.1.1      "The assumption that the Commission will relocate the site is invalid as evidenced by our plans for a major renovation of the monitoring site during 1984 covering both buildings and structures. The end goal of the renovation is to extend the life of the monitoring site for at least another 35-40 years. The Congressional appropriation committee has given tentative approval for funding of the project."

Response: The comment is acknowledged. This is currently noted in the Revised DEIR. Referring to other FCC comments, we understand that the issue is not whether the Commission plans to relocate the monitoring facility, but whether the facility would need to be relocated as a consequence of the impacts of nearby urbanization. Mitigation of this contingency, including the appropriate responsibility of the project, must be addressed.

Q.1.2      "Costs of such an effort (relocation and construction of a new monitoring site) would be at least one million dollars (1983) not including the cost of land at a new site or relocation of employees. The funds would have to be provided in advance so that a new site is constructed and employees relocated prior to disposal of the current site. Federal Property Management Regulations . . . (do not) address sale, lease back, and replacement using funds from sale to a non-governmental entity and funds from land sales are usually deposited in the Government's General Budget. the Congressional Oversight Committee, and possibly special legislation to have such funds remain in control of the Commission . . . The County may wish to increase the Sponsor's Advance by 1.5 million dollars to fund purchase of the . . . (FCC) property and to cover associated land transfer and development fees."

Response: A solution should be negotiated at the outset of the project to secure an alternate site acceptable to the FCC in order to assure that the potentially adverse impacts of the development will be mitigated without cost to the public or the Federal government.

Q.1.3      "Within the (Draft EIR) the Fiscal Impact Analysis (Secion 5.8) does not address either the impacts of the project on the Commission or the impacts of the project adjusting to the

Commission's clearly defined intention to retain the monitoring site."

Response: The consultants were not requested to evaluate "fiscal" impacts of the project on the FCC monitoring station; we understand that these types of impacts would relate primarily to costs and revenues associated with the licensing and monitoring of new radio transmitters within the project area; these specific, project-related costs and revenues cannot be defined at this time.

The proposed Las Positas development would, without significant modification to the proposal and/or to the monitoring station (if this is possible), significantly impair the operations of the facility. Discussions with FCC staff do not clearly indicate whether these impacts can be mitigated through alterations to station facilities or operations or whether relocation would clearly be required. In either case, we agree that a solution should be negotiated to pursue mitigation without cost to the public or to the federal government.

Q.1.4 "Neither version of the DEIR has adequately addressed the impact of the Commission Rules and Regulations covering protection for FCC monitoring stations . . . These rules protect the monitoring stations from harmful interference by radio transmitters authorized by the Commission in the vicinity of the monitoring stations. These rules could present obstacles to licensing radio stations in the Las Positas area such as those operated by public agencies, private individuals, or private business. DEIR Appendix E includes a sample of these Rules; however other Rules . . . address many other devices, such as power lines, computers, and Cable TV systems."

Response: The comment is noted. FCC staff have also submitted additional information relating to the compatibility of surrounding land uses, activities and improvements with monitoring stations. The following is extracted from their letter of July 18, 1983 (R.W. Crisman, Chief, Engineering Division, Field Operations Bureau):

"There are three areas of concern when considering the problems associated with protection of a monitoring station's ability to effectively carry out its mission. The first area has to do with the distortion of radio signals caused by natural and man-made structures near the monitoring site; the second area has to do with the interference to monitoring receivers from electrical noise caused by power transmission lines, industrial plants,

electrical equipment used in homes and other such sources; and the third has to do with interference caused by strong radio fields from nearby transmitters.

"Concerning the first area (distortion of signals), we must have minimum separation of 1Km from any lake, pond, creek or intermittent stream which may result from any new construction in the area. We must have a minimum separation of 200 meters from any large buried conduits or metal pipes or any metallic fence of 2.5 meters or less in height. We must have a minimum separation of 1 Km from any metallic fence or like object in excess of 2.5 meters high, rail or streetcar lines or large metal or metal-reinforced structures, including water towers.

"We must have no structures of any kind that will project to a vertical angle of more than 3 degrees above the horizontal as viewed from the site of the direction finder whose coordinates are 37° 43' 30" N Latitude, 121° 45' 12" W Longitude.

"Concerning the second area (electrical noise), we must have a minimum separation of at least 1 Km from any industrial or congested residential district. An even greater spacing 10 KM is required from certain types of industrial plants utilizing electrical welders, high power industrial heaters, diathermy machines, smoke precipitators and other machines with significant levels of RF energy. We require a minimum of 1 Km clearance from power transmission lines of 10kV to 100 kV, and 10 Km clearance from lines which carry extremely high voltages used in long-distance power transmission. We require 1 Km clearance from any heavily travelled highway.

"Concerning the third area (strong transmitter fields) we normally review and place appropriate limitations on any installation which would place a field strength in excess of 10mV/m over the monitoring site on any frequency from 10Khz to 50 mHz, and in excess of 50 mV/m from 50 mHz to 1000 mHz. Persons wishing to operate a transmitting station which could produce fields at or near these levels are advised to consult with the Chief, Field Operations Bureau (FCC, Washington, D.C.). . .

"In addition to transmitters falling within the above guidelines, we can not accept any type of installation which would produce spurious emissions or measurable desensitization in FCC receivers which result in impaired monitoring ability in the public safety, marine or aviation band or in any other service where reception of radio signals is critical for protection of safety to life.



"Although we recognize the above criteria may have already been violated to a limited extent near Livermore, we do not anticipate moving the monitoring site.

"We intend, however, to take whatever measures are necessary to prevent any further degradation of our local radio environment so as to protect the substantial investment this agency has made at the Livermore facility."

The application of these standards to the Las Positas project area would require significant modification of the proposed Land Use Diagram. Approximately three quarters of the area proposed for urbanization is within the 1 Km sphere of the station within which there could be: no lakes, ponds or creeks resulting from construction (eg. brine evaporation ponds, storage ponds, etc.); no metallic fences or similar structures higher than 2.5 meters; no large metal or metal reinforced structures, including water towers; no industrial or high density residential uses; and no heavily traveled highways. It is questionable: 1) whether there is sufficient land elsewhere in the project area to allow relocation of industrial, commercial, and high density residential uses now proposed within the sphere; and 2) whether these adjustments could be accomplished without seriously compromising the overall design concept and objectives for a mix of residential (attached and detached), commercial and industrial uses. If the project were redesigned to meet the stated standards, the total amount of industrial development would need to be substantially reduced. This would reduce local job opportunities such that a greater proportion of employed residents would need to commute to jobs elsewhere in the Valley and region. Further, the total amount of high density residential development, and the number of multi-family (rental and sale) units would also need to be reduced, while the number and proportion of low density, single family units would increase. This would significantly limit project housing opportunities. Reductions in industrial, commercial and high density residential uses could also adversely effect the financial viability of the project, although further analysis would be needed to determine the net effects of these required changes on costs and revenues.

Q.1.5 "The project alternatives discussed in Section 7.0, specifically 7.5, are more compatible with our land use from a physical aspect . . . However, the land uses proposed for adjacent parcels are incompatible with our land use for the reasons documented in previous correspondence. The addition of brine evaporation ponds

causes some concern, especially the pond to be located south of Hartford Avenue,. The pond would be located sufficiently close to our direction finder (DF) to potentially affect its accuracy. The industrial buildings could affect the operating of the DF either by exceeding the vertical clearance angle required by the DF, or the associated industrial uses would generate various types of radio-frequency (RF) noise which would adversely impact DF sensitivity. RF noise emanating from vehicles operating on the streets which would bound our property on most sides would decrease the sensitivity of our receiving systems and thereby compromise some aspects of our daily operations. Signals emanating from computers which would undoubtedly be used in the industrial as well as . . . town commercial center and areas designated for office use, also would adversely impact our operations. Conversely, the operation of our HF ratio transmitter could degrade the operation of radio receivers in home entertainment equipment, computers, and other electronic equipment located in close proximity of the transmitting antenna."

Response: Noted. Refer to the response to Comment Q.1.4.

Q.1.6 "Any aspects of the project which would drastically increase the ground water level may have an adverse impact on our antenna installations and building by possibly causing movement of the supporting structures."

Response: The comment is acknowledged. This potential problem would be mitigated by proposed groundwater management.

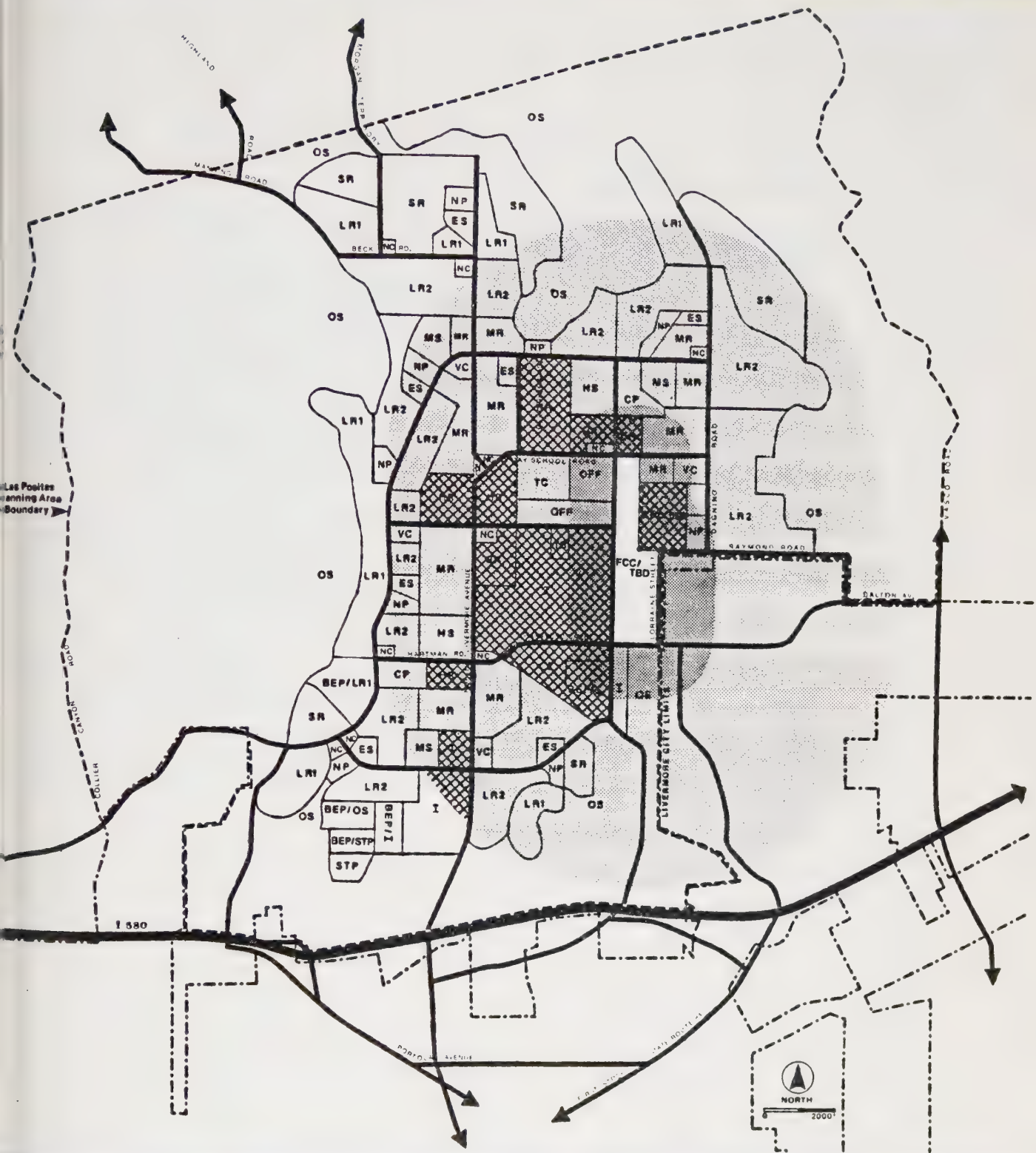
Q.1.7 "Our past experience has proven that our use is compatible with some forms of urban development. One monitoring site was protected by the provision of open space along the boundary . . . Additionally, encumbrances on the title of adjacent land has been used to protect our direction finders as a zoning compromise."

Response: Noted. Refer to the response to Comment Q.1.4.

Q.1.8 "If the project is adopted, the project developers must be required, at the onset, to set aside funds to cover costs associated with modification of our existing plant to accommodate the problems encountered with the project or, in the worst case, to cover the costs of relocating the monitoring station and its personnel."

Response: Refer to the response to Q.1.2.





MONITORING STATION Potential Impact Zones (Refer to Response to Comment S.1.4)



R.           Acoustical Conditions

R.1.0       Environmental Health Division, Department of Health Services,  
Memorandum of May 10, 1983

R.1.1       The noise levels at existing and proposed schools continue to be of concern . . . . The County's standards of  $L_{dn}$  70 . . . . for schools, libraries and churches is too high and is inconsistent with Section 216, California Streets and Highways Code, which limits noise due to freeways to 50 dba inside classrooms. The County's standard may also be inconsistent with the State's Guidelines for Noise Elements, if mitigation measures to reduce outdoor noise levels to less than 60  $L_{dn}$  are not implemented."

Response: The Guidelines for Preparation and Content of Noise Elements of the General Plan (Office of Noise Control, February 1976) indicate an overlap between normally acceptable and conditionally acceptable community noise exposures. 70 dB,  $L_{dn}$  is the upper limit for normally acceptable community noise exposure for schools, etc. Buildings would normally not require any special noise insulation requirements. A range of 60 to 70 dB  $L_{dn}$  would be conditionally acceptable for schools: new construction or development would require detailed analysis of noise reduction requirements, with noise insulation features included as required. This would involve conventional construction but with features such as closed windows and a fresh air supply system or air conditioning.

III. WRITTEN COMMENTS RECEIVED ON THE MARCH, 1983 REVISED DRAFT  
ENVIRONMENTAL IMPACT REPORT





COUNTY OF ALAMEDA  
OFFICE OF THE COUNTY ADMINISTRATOR

MEMORANDUM

May 18, 1983

TO: William Fraley, Planning Director

FROM: Mel Hing, County Administrator *Mel Hing*

SUBJECT: Draft EIR - Las Positas

My staff has reviewed the revised draft EIR for the Las Positas project. Their comments are on: (1) the proponent's proposal; and (2) the proposal as amended through mitigation measures by the financial consultant. They also reflect the concerns of County departments directly impacted by the proposed development project. However, they are not intended to be inclusive. As this project evolves and issues are clarified, there may be additional questions or concerns to address. Hopefully, these concerns can be resolved soon, and we can proceed with the proper analysis of the proposal.

General Concerns:

1. The proponent outlines the use of a \$14 million advance, the creation of a Capital Improvement Fund, and a Public Acquisition Fund. The proposal needs clarification. It would be helpful if the proponent could clarify how these funds and cash advances are to work in sufficient detail to enable the County to determine if the proposal is practical and legal. A determination will then have to be made about the risk this project poses to the County. *P. 18.1*
2. The proponent's financing proposal, as outlined above, varies dramatically from the traditional development project. First, the proponent does not represent all the property interests in the proposed development area. The County would be best served if there were a vehicle to assure that all property owners were bound by the proposal. Second, it appears the County would be vulnerable if the project costs and revenues were not achieved. The state of the County's current financial situation is such that it may be financially burdensome to proceed with the project without specifically determining the financial impacts. *P. 18.2*  
*P. 18.3*  
*P. 18.4*

William Fraley

-2-

May 18, 1983

3. The proponent's proposal does not appear to be financially self-sufficient. Specifically, the proponent's proposal outlining the cost of capital projects as well as the ongoing cost of services appears to have a negative impact on the County's General Fund as well as other related funds, including Roads, Library and Structural Fire. Unless major changes are provided with the proponent's proposal, these funds will incur substantial deficits which will not be overcome in future years. As a result, the proponent's proposal will have a negative impact on the County's existing service levels. These service levels already have been substantially reduced since 1977-78. *P. 18.5*
4. The proponent is suggesting a County Service Area to provide the bulk of services to the development. The financial consultant is proposing a number of alternatives to mitigate the financial vulnerability to the County. However, no single proposal is recommended, making it unclear to the County what form the proposal is to take. *P. 18.6*
5. The question needs to be addressed as to which form of government is more capable of providing urban services -- a city or county. The County may not be the best vehicle to deliver municipal services. *P. 18.7*

Specific Concerns:

1. Capital Improvement Funds appear to be insufficient to finance up-front capital improvement projects, placing a financial burden on the County. Table 5.42 on Page 5-156 clearly identifies the financial shortfalls. Mitigation measures proposed on Page 5-161 assume adoption of a conventional special assessment district approach or a community facilities district. While a great deal of the report spends time commenting on the pros and cons of the two approaches, no specific proposal is outlined nor proposed by the proponent. The disadvantages of these proposals are (1) they would require a two-thirds vote of the qualified electors in order to increase taxes to pay for the capital costs and operational costs and (2) the overall cost to each developed property would be increased.
2. The alternative approach outlined by the financial consultant to have the County purchase all public use and non-developed land through a County Service Area raises concerns on the part of the County in that it would appear to place the County in the position of actually managing the development project. The concern here is twofold: First, the County appears to face potential risks without any commensurate benefits. Second, the County's ability to successfully manage all aspects of the project is a new role, basically untested. Moreover, this role has been the traditional role of private developers. *P. 18.8*
3. The proponent proposes the creation of a County Service Area to administer capital funds as well as the ongoing operation and maintenance of the sewage system, water system and street lighting system. The suggested \$81,000 to provide for administration of the County Services Area seems somewhat understated, given the expectations and the complexities associated with managing this district. *P. 18.9*

May 18, 1983

4. The proposal as outlined will require a change in the County's general plan as well as zoning ordinance changes. The proposal also provides for the creation of a County Service Area. These changes are subject to a referendum after the Board of Supervisors takes a specific action. Based on the past experience of this project and the interest expressed by citizens throughout the County, an election may have to be held on this project. My concern is that such an election might be beneficial initially to determine the voters' views on this development project. P. 18.10
5. The proponent's review of the cost and revenue impact to the County's General Fund is questioned. For example, property taxes have been adjusted for a 7% inflationary growth as well as phasing the development itself. This 7% inflation factor is not consistent with maintaining revenues and costs at the 1981 level, resulting in a more favorable revenue estimate. Secondly, sales taxes seem to be overestimated by a minimum of 4%, based on actual work papers developed by the financial consultant. P. 18.11
6. Motor Vehicle In-Lieu taxes have been calculated and again may be overstated for two reasons. The first is that the per capita rate as applied by the financial consultant of \$13.96 is not based on the budgeted amount; the rate is equivalent to \$12.09 per capita. Secondly, the financial analysis does not recognize that the State has been cutting the Motor Vehicle In-Lieu funds to help balance their budget, and has been doing this the last two fiscal years, as well as proposing to continue this withhold in future fiscal years. Thus, the assumptions of growth and the failure to account for a decline in this revenue source is not realistic with County experience. P. 18.12
7. The costs assumed by the proponent of the project's impact on the General Fund during buildout appears to be understated by \$30.53 per capita. Our 1981-82 analysis indicates per capita costs of \$150.67 in General Government, \$31.45 for Health Care, \$21.17 for Social Services, and \$54.36 for Sheriff Patrol, for a total overall per capita cost of \$257.65. As contrasted with the report's costs of \$227.12, a variance of \$30.53 exists. P. 18.13
8. The resulting impact of the revenue analysis and total cost analysis on a per capita cost basis as indicated on Tables 5.47 and 5.48 appears to increase the County's liability for maintaining existing service levels. The conclusion based on our analysis at this time is the project would have a negative impact on the County's services levels, and thus the development project would not be self-sufficient. P. 18.14
9. The financial consultant outlines the point on Page 5-180 that the proposal does not provide an analysis or consider industrial commercial land uses beyond the project boundaries. It is suggested that such development may facilitate employment for the residents of Las Positas and produce off-site revenue to the County which could be used to offset General Fund deficits. This analysis appears speculative and an approach

May 18, 1983

10. Under the General Fund vulnerability analysis on Page 5-183 and 5-184, the financial consultant indicates a worst case scenario as depicted on Tables 5-53 and 5-54. The County believes that this is not a worst case scenario, but is, in fact, realistic financial data from the 1981-82 budget with adjustments for Revenue Sharing funding, Motor Vehicle In-Lieu revenues, and Health and Social Services costs. As indicated earlier, the 1981-82 totals a per capita amount of \$257.65. The 1982-83 budgeted per capita costs for these same programs is equal to \$269.88. The County's actual per capita costs will increase beyond the budgeted level for the following two reasons: (1) The State is adjusting current year Motor Vehicle In-Lieu fees to reduce the figure from the budgeted amount, and (2) the costs of Social Services and Health programs on a net basis will be substantially greater than anticipated in the budget. The impact of this financial analysis is that the proposed development project would proportionately increase the County's financial problems unless alternatives are proposed which would mitigate the problem. P. 18.15
11. The financial consultant proposes mitigation measures on Page 5-189 which recommends Sheriff's services being provided through a community facilities district and/or include more commercial or industrial land in the land use plan to generate additional revenue to the County. While it is clear that a benefit assessment approach would help to mitigate the financial impact on the County's General Fund, it is unclear at this time whether it would be sufficient to offset the entire shortfall. Moreover, the approach to include more industrial or commercial land is not developed in sufficient detail. The County and the proponent need to review this proposal to determine if it is practical and would result in alleviating the financial problems. P. 18.16
12. The proposal does not address animal control services. It does not seem realistic that a community of this size would not require this service. P. 18.17
13. The proponent recommends the Road Fund finance road improvements; however, there are not sufficient funds to develop an adequate road system for the project under the proponent's proposal. This summary is shown on Table 5-49. There is not sufficient detail from the original proposal to determine how this financial problem would be resolved. P. 18.18
14. The financial consultant provides for the establishment of a road maintenance benefit assessment district which would be combined with the street lighting maintenance program. This alternative is recognized; however, it is unclear whether the proponent agrees with this proposal. Also, it is unclear what the overall impact will be with this benefit assessment district to the financial feasibility of the project, since there is not a cohesive proposal specifically setting forth those areas which are to be funded by benefit assessment. Moreover, will this funding be adequate to maintain the road system. P. 18.19
15. The proposal does not provide sufficient information to determine



WV

LEAGUE OF WOMEN VOTERS OF LIVERMORE AMADOR VALLEY  
Post Office Box 702, Livermore, CA 94550 (415) 455-0800

ALAMEDA COUNTY PLANNING DEPARTMENT  
MAY 15, 1983

Alameda County Planning Commission  
399 Elshorot  
Hayward, CA 94544

Re: Las Positas Draft EIR

Dear Planning Commission:

The League of Women Voters still favors the "no project" alternative to the Las Positas General Plan Amendment and Rezoning Considerations. It seems to us that the issue is not growth or no growth, but one of who will plan the growth and at what rate it will occur.

The League supports urban-centered growth to minimize sprawl and to keep government close to the people.

We were hoping the financial analysis would have compared the cost of being a resident in a New Town County Services Area versus becoming a resident of Livermore. It would seem that knowing such costs would help the decision makers decide whether urbanization under the County form of government or growth associated with an existing city is best for the potential residents.

We also have serious reservations about waste water treatment for this development. The problems were well covered at the public hearing on 4/28 in Livermore.

After hearing several ranchers and other agricultural land owners and workers testify, the League would also like to know what the County does to preserve agricultural land for those who want to stay in agriculture. Is agricultural zoning only a holding pattern for urbanization? Can the County encourage density transfers, purchase of development rights, formation of farmland trusts, large-lot zoning, or other methods to keep agriculture viable in our County?

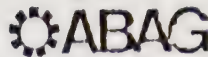
The League, then, asks for a more comprehensive financial analysis; an increase in Livermore's sphere of influence so that growth will be compact and city-centered with government close to residents; an examination of county policies affecting the preservation of agriculture as a viable occupation.

Sincerely,

*Mary Ann Hannon*

Mary Ann Hannon  
President

Copies to: Supervisor Excell



Association of Bay Area Governments

Hotel Claremont • Berkeley, California 94705 • (415) 841-9300

May 16, 1983

Mr. William H. Fraley  
Planning Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

RE: Las Positas General Plan Amendment and Rezoning Considerations

Dear Mr. Fraley:

ABAG staff appreciates the opportunity to review the revised DEIR for the proposed General Plan Amendment to accommodate the Las Positas development proposal. The revised document presents a thorough examination of many of the issues surrounding this complex proposal. However, we feel that the DEIR, in Section 5.3, misinterprets ABAG's long-standing policy position on new large-scale developments. The misinterpretation, in turn, results in insufficient consideration of concerns of Bay Area local elected officials embodied in the adopted Regional Plan and in Executive Board policy positions relative to development in the Livermore Amador Valley. Our staff comments focus on consideration of impacts on regional and subregional policies concerned with city-centered development, air and water quality, jobs-housing relationships, infrastructure financing, provision of low and moderate income housing, and governmental coordination. The Executive Board has not taken a position on this Las Positas General Plan Amendment proposal.

E.3.1

#### Consistency with ABAG Policies

The discussion of consistency with ABAG policies on page 5-70 of the DEIR quotes the New Communities Strategy from the ABAG Regional Plan 1980, and the 1975 Executive Board policy statement on the original proposal for Las Positas. Actually, the New Communities Strategy has not been used in ABAG reviews since 1971, and was deleted from the Regional Plan when it was amended by the General Assembly in October 1981.

The guiding principle in ABAG's review of development proposals is the "city-centered" approach to regional growth. The principle is embodied in the Regional Plan's Urban Development Strategy--an integrated set of land use, development, fiscal and environmental management policies. Additional review criteria for the Las Positas proposal have been derived from Executive Board positions on the original Las Positas project (cited in the DEIR) and on subsequent grant applications and local general plans submitted by jurisdictions in the Livermore Amador Valley.



Mr. William H. Fraley  
May 16, 1983  
Page 2

Basically, the premises of the Regional Plan's Urban Development Strategy are that:

1. Urban growth should take place in and around existing cities in which needed facilities and services are available or committed in capital budgets; E.3.1
2. Living, working and shopping in the same community should be promoted; the need for long distance commuting, with attendant highway, fuel and air pollution costs, should be reduced;
3. Housing and employment opportunities should be provided for low and moderate income persons;
4. A coordinated program of planning and action among the many public agencies and the private sector is needed to resolve subregional economic, environmental and service delivery problems.

The Las Positas proposal has serious conflicts with each of the regional positions stated above, that are not adequately discussed in the DEIR.

#### New Growth in Existing Communities/Subregional Cooperation

##### Discussion:

A community of 45,000 would be established in an unincorporated area, outside any city's urban service limits, without basic infrastructure and with severe uncertainties and cost constraints relative to provision of adequate water supply and to disposal of wastewater treatment effluent. Instead of fostering coordination of service delivery and financing capabilities of the existing cities and special districts, the proposal would create yet another independent governing entity and financing mechanism.

##### Recommendation:

The Final Environmental Impact Report should give fuller consideration to the alternative of annexation to the City of Livermore. Although Livermore would not develop Las Positas as rapidly as the County would, if all the uncertainties could be resolved, the City is a full service jurisdiction and is a participant in cooperative efforts in the Valley to deal with the extreme water supply and wastewater disposal problems.

#### Services Available or Committed

##### Water Supply

##### Discussion:

The DEIR indicates that the project is dependent on future water supply

Mr. William H. Fraley  
May 16, 1983  
Page 3

entitlements from the State Water Project that are not "clearly defined." Furthermore, the DEIR states that "If these entitlements cannot be provided, it is expected that deficits in water supplies would occur with Las Positas."

##### Recommendation:

Since an adequate supply of water is crucial to the economic viability of this project, it is recommended that either (a) a firm commitment to an adequate water supply be secured before proceeding with this project, or (b) the EIR include a Phase I development plan that is economically feasible, based only on the currently available water supply.

##### Water Quality

##### Discussion:

A reverse osmosis demineralization process is proposed to remove salts from project wastewater, groundwater, or both. While technically feasible, this approach will be very expensive both to build and to maintain. Future problems with either maintenance or financing could result in disposal of incompletely treated water to the Las Positas basin and contamination of the groundwater in the Livermore-Amador Valley basins south of Las Positas. J.10.2

The DEIR concedes that export of wastewater by pipeline is a lower cost alternative. The responses to comments on the original DEIR further concur that the export pipeline is the best approach based on design and simplicity.

##### Recommendation:

Project sponsors and the affected jurisdictions should meet with East Bay Dischargers Authority to try to resolve the export pipeline alternative before further considering the demineralization approach.

Additionally, before proceeding with this project, further hydrogeological studies should be conducted to determine: J.10.3

- o whether both wastewater and groundwater need to be demineralized;
- o how much groundwater must be extracted from the groundwater for treatment; and
- o whether the demineralized groundwater would be permitted to enter the potable system.

##### Jobs/Housing Relationships

##### Discussion:

The Table on pages 2-3 and 5-50 presents a summary of the proposed phasing of housing and jobs. According to the Table, at buildout (year 2005), the



# Metropolitan Transportation Commission

May 16, 1983

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Executive Director

Executive Director

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Executive Director

Executive Director

Executive Director

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

Attn: Bill Allin

RE: Las Positas General Plan Amendment and Rezoning Consideration DEIR

Dear Mr. Allin:

This letter contains MTC's review comments on the subject DEIR. We are, of course, concerned about the potential impact of the proposed project on regional transportation facilities. Our general sense of the DEIR is that the project will have a substantial negative impact on traffic flow on I-580 unless proposed roadway improvements are made and a TSM program that diverts at least 25 percent of vehicle movement is adopted. Even so, some degradation of service levels is projected.

This best case evidently depends on the positive resolution of a number of uncertain factors. Some of these are:

- o That effective TSM programs will be adopted by the tenants of the project. The suggestion is made that the adoption and maintenance of such programs would be difficult, but that they could be made conditional on the approval of the project. It is not stated that approval will be made conditional.
- o Included in the proposed TSM measures are HOV lanes on I-580 and a BART extension. Existing HOV lanes on I-580 are about to be eliminated; and whereas a BART extension is a long-range goal in MTC's Regional Transportation Plan, funding problems in the nearer term make it a remote possibility.
- o The 25% diversion assumption for the effectiveness of TSM could be optimistic. Whereas, there are places and situations where a higher diversion than 25% is achieved, the large volume of out-commuting and the length of potential work trips make this a sensitive assumption.
- o A number of roadway improvements are shown to be essential. Whereas, the financing plan in the DEIR proposes means of financing them, a substantial part of the finances depend on sources outside the project, and the availability of such financing is highly uncertain.

P.13.0

Page 2  
Letter Mr. Allin  
May 16, 1983

In summary, if regional facilities in the neighborhood of Los Positas are not to be overwhelmed by traffic generated by the project, a substantial number of mitigating measures have to be adopted. These measures are now put more in the form of hopes and proposals than as firm conditions. The region should be assured that whatever uncertainties of actions and financing there may be, appropriate conditions on transportation impacts will be adopted.

Thank you for the opportunity to review this DEIR.

Very truly yours,

*Andrew Ungar*

Andrew Ungar  
Environmental Review Consultant

AU:mw  
902-90-01  
cc: ABAG Areawide Clearinghouse

Alameda Co. Planning Dept.

-3-

May 16, 1983

We recognize that the issues raised are complex and may be difficult to resolve, but we believe that Las Positas is a regionally-significant proposal. We believe that the main air quality questions need further analysis and, to the degree required, mitigation measures need to be committed to, in the Final EIR.

If you have questions please do not hesitate to call Irwin Mussen or Sally Freedman of our Planning Division.

Sincerely,



Milton Feldstein  
Air Pollution Control Officer

MP:ce

cc: Irene Kan, ABAG  
Anne Geraghty, ARB



proposed project would provide housing for approximately 18,000 households. Assuming an average of 1.35 employed persons in each household, the table shows 24,300 employed persons at buildout. Estimated available jobs by 2005 total approximately 22,200, yielding a projected ratio of employed persons to jobs in Las Positas of 1.1 to 1.

While this is a laudable goal, its achievement appears to be unlikely. Several of the assumptions upon which the Las Positas proposal relies are exceedingly optimistic and/or not in keeping with prevailing local conditions. First, the projected number of workers who will live in Las Positas is based upon an assumed 1.35 workers per household. This is an exceptionally low estimate in light of the current (1980 Census) figures of 1.4 to 1.6 workers per household in the subregional area. An assumption of 1.5 workers per household by the year 2005 would result in a total of 27,000 workers living in Las Positas by that time. Moreover, there is every reason to assume that the actual number of workers per household will continue to increase rather than remain constant.

Second, the projected 22,200 jobs in the project itself also appears to be an optimistic figure. This projection, if realized, would result in approximately 45 employees per acre on commercially developed property. Again, this is a rather high estimate. A more typical--and more realistic--estimate would be approximately 30 employees per acre. This would result in only about 16,300 jobs rather than 22,200.

Third, the projection of 22,000 jobs assumes full project buildout. Given the magnitude of the Las Positas project as a whole, any assumption of complete buildout on schedule appears to be speculative at best. Unfortunately, the development of residential units is scheduled to move forward at a more rapid initial pace than is the development of commercial and industrial sites within the project. Approximately one third of the projected jobs are not planned until after the year 2000. Thus, if complete buildout is not achieved, it is reasonable to expect that it will be jobs that will fall short, rather than homes.

#### Recommendation:

The projected ratio of 1.1 workers per job in Las Positas appears unrealistic. A far more likely ratio is in the range of 1.6-1.7, based upon approximately 27,000 workers and approximately 16,300 jobs.

#### Air Quality

##### Discussion:

Concerning efforts to reduce long distance commuting, the DEIR assumes that approximately 60 percent of the peak hour traffic and 65 percent of the daily volumes would remain entirely within the development, based on the 1:1.1 jobs-to-workers per household ratio shown in the tables referred to above. The preceding discussion suggests that this ratio is low, making the assumed percentages of internal commuting seem very high.

Additionally, the proposed transportation systems management (TSM) measures are projected to reduce traffic volumes by 25 percent. This appears overly optimistic.

##### Recommendation:

Assumptions about the percentages of internal and external trips used in the traffic and air quality analyses should be revised downward consistent with revised jobs-to-household ratios discussed in the preceding section. An additional carbon monoxide (CO) air quality analysis should be provided for traffic volume reductions on the order of 10 percent.

#### Provision of Low and Moderate Income Housing

##### Discussion:

A second factor contributing to the need to reduce the assumptions about the percentage of internal commuting and resulting effects on air quality and traffic is the information provided in the section on Housing Need and Affordability (pp. 5-51, 52) and on capital improvements and ongoing costs to be borne by future residents in the fiscal impact analysis.

Table 5.44 (p. 5-16) of the fiscal analysis shows an average per housing unit cost of major capital improvements of \$8,775. The accompanying text states that these costs are only for major capital improvements. An equivalent amount would be required for flood control improvements, local streets and sewer laterals. All capital costs not offset by lowered purchase price for the land would be added directly to the purchase price of the unit. The DEIR states that since most home purchases will be conventionally financed, homeowners would be paying for these improvements at a higher rate of interest than if they were financed by municipal bonds. Other ongoing costs, besides user charges, attributable to Las Positas would include a number of special taxes and assessments.

Relative to this, the discussion of Housing Need and Affordability on pp. 5-52, 53 is confusing. Table 5.24 is entitled "Anticipated Las Positas Housing Program." It shows Housing Type/Density, Number of Units, and Average Sales Price/Unit. The associated text states that the table indicates the sponsor's anticipated housing costs by type (emphasis added). Developer's costs and sales price are not interchangeable. Either the developer's cost should be lower or the sales price higher--to represent the addition of land cost and developer's profit to the sales price.

The DEIR goes on to state that, based on these anticipated sales prices, approximately 85 percent of the total would be available to moderate and low income households. Of these, 7 percent are proposed as manufactured housing with an estimated average sales price of \$50,000. Presumably, these are the units that would be available to low income households.

William H. Fraley  
May 16, 1983  
Page 6

Whether the \$50,000 is the developer's cost or the sales price, once utility and maintenance expenses are added, it is unlikely that many lower income employees would be able to live in Las Positas without innovative financing programs or rent subsidies. D, 4, 7

**Recommendation:**

- o Table 5.24 and accompanying text should be clarified in the FEIR to distinguish between developer's cost and sales price, and dollar amounts adjusted accordingly. Dollar amounts should also reflect the costs of new infrastructure to the extent that they are to be borne by the consumer. D, 4, 6
- o The County should consider innovative financing programs with respect to Las Positas. Specifically, we recommend consideration of mortgage revenue bond issuances to write down interest rates, especially for first-time buyers, and development agreements to ensure that units initially affordable to low and moderate income households remain so for a specific time period. D, 4, 8
- o In modifying assumptions about the percentage of internal and external trips used in the traffic and air quality analyses, consideration should be given to the likelihood that, although the project would provide lower income employment, it may not provide commensurate housing opportunities for lower income households.

Large-Scale Development in Unincorporated Areas/Financing and Project Management

**Discussion:**

Of major concern to ABAG is the precedent-setting effect on Alameda County and other counties in the region of amending a county plan to permit large-scale urban development in an unincorporated area, outside of existing cities' urban service limits, where adequate facilities are neither in place nor committed in capital budgets. In general, the absence of facilities for water quality management is the most serious constraint to urban development in unincorporated areas. In the Livermore Amador Valley the long-standing wastewater treatment and export problem is so severe that it can only be resolved on a subregional basis through cooperative planning and action among the cities, County, and special districts, working with developers. The vulnerabilities and burdens of going outside the orderly extension of existing urbanized communities in a developer-financed, county managed development process are clearly spelled out in the Fiscal Impact Analysis in the DEIR (Section 5.8). D, 5, 2

**Recommendations:**

As stated earlier, ABAG policies support annexation to the City of Livermore; we would like to see Alternative 7.6 examined more fully in the FEIR. Of the other alternatives presented, staff believes Alternative Land Use Program with comparable housing and employment (2.4) to be more realistic.

Mr. William H. Fraley  
May 16, 1983  
Page 7

Certain other information should be clearly stated in the FEIR before the document is certified:

- o If the project is to proceed to buildout as proposed, the mitigation measures to control the pace, scope and quality of development will only work if the County Board of Supervisors actively controls the development process throughout the project period. There can be no assurance that the mitigation measures will be implemented if the CSA board were to be locally elected residents or if the area should incorporate. D, 5, 1
- o The financial plan should clearly indicate how revenues from the proposed project will be provided to the other public agencies that will be financially affected by the development (e.g., the City of Livermore for costs of library services and traffic improvements). D, 5, 11

Please contact me if you have questions about these comments.

Sincerely,

*Yvonne San Jule*

Yvonne San Jule  
Planning and Budget Coordinator



RECEIVED  
COMMENTS BY THE CITY OF LIVERMORE  
ON THE REVISED DRAFT ENVIRONMENTAL IMPACT  
REPORT (DEIR) FOR THE LAS POSITAS GENERAL PLAN AMENDMENT  
AND REZONING CONSIDERATIONS (MARCH 1983)

## I. General Comments

The fundamental purpose of the DEIR is to inform decision-makers and the public about the potential environmental impacts of the Las Positas project, to identify ways in which those impacts can be avoided or reduced and to prevent adverse impacts through use of alternatives and mitigation measures. (14 Cal. Admin. Code § 15006.) This DEIR fails to accomplish these purposes for a number of reasons which are set forth in these comments.

Perhaps the most pervasive problem with the DEIR is its method of presenting environmental impacts and potential mitigation measures, which is confusing to the reader and which tends to obscure the most critical facts. The DEIR frequently mixes together impacts and mitigation measures, often giving little idea of the likelihood or feasibility of adopting the mitigation measures. (See, e.g., section II.A. below.) Often listed under mitigation headings are a variety of other activities and studies which may or may not take place and which are not mitigation measures. (See, e.g., pp. 3,4, below.) It is frequently impossible to discern potential impacts in a given area without painstaking scrutiny of several different parts of the DEIR. It is even more difficult to determine which of the impacts are proposed to be mitigated and to what extent they will or can be mitigated. The result is a confusing hodge-podge of facts, potential impacts and possible mitigation measures which leaves the reader with little understanding of the array of impacts associated with the project and the extent to which measures can and will mitigate or avoid those impacts.

Related to these deficiencies, the DEIR's listing of unavoidable adverse impacts is incomplete and misleading (DEIR, p. 6-1). For example, no unavoidable adverse impacts are noted with respect to water supply. Yet, clearly the very real possibility that no additional SWP facilities will be constructed within the project time frame would generate substantial unmitigable impacts. Delay in approval of the Las Positas project, listed as mitigation for the impact, cannot be considered a mitigation measure. I,3,5

Similarly, the DEIR includes no air quality impacts in its list of unavoidable adverse impacts. Yet, elsewhere the DEIR notes that the project "would result in significant increases in emissions due to increases in traffic levels in the basin." (P. 5-60.) A review of the proposed air quality mitigation measures scattered in different sections of the DEIR indicates that these impacts cannot and will not be totally mitigated. (See, e.g., p. 4-13.) It is impossible to determine the extent to which the air quality impacts could or would be mitigated because, other than Transportation System Management measures, the discussion of mitigation measures omits this critical information. B,2,1

In addition, the DEIR fails to note the impacts of Las Positas on the regional park system as an unavoidable adverse impact despite the fact that no mitigation is proposed. (P. 5-84.) The DEIR should also note as an unavoidable impact the growth-inducing impacts of amending County plans and policies to allow large-scale urban development in unincorporated areas. A related unlisted unavoidable impact is that of violating fundamental statutory and Alameda County LAFCO policies discouraging urban growth outside of municipal boundaries. And the DEIR does not even list as an unavoidable adverse impact, as it should, the direct loss of large amounts of agricultural preserve lands to the Las Positas project.

In numerous other areas, the DEIR notes (frequently under the label of "mitigation measure") that additional studies are necessary to determine the extent of the impacts. These studies may well determine that there are many more unavoidable adverse impacts that have not yet been identified. As a result, analysis of some of the most important impacts is omitted from the DEIR entirely. These impacts should be analyzed before action is taken by the County on this proposed development.

In addition, the DEIR fails to identify an environmentally superior alternative as it is required to do. (14 Cal. Admin. Code section 15143(d).)

## II. Environmental Impacts

### A. Water

The DEIR analysis of water demand and supply is inadequate in several respects. First, it underestimates the projected demand for water. It assumes that water demand for the entire Las Positas project would range I,3,1



between 7,300 and 9,000 acre feet per year, yet that estimate includes only residential demand, not industrial, commercial, and fire flow demand. To obtain accurate estimates of total water demand for the project, the DEIR must include commercial, industrial and fire flow demand as well. Moreover, the water demand figures are not broken out by land use as they should be in order to allow full analysis of total demand. I.3.1

In addition, the DEIR's treatment of the impacts of water supply deficits and mitigation measures for these impacts is misleading and inadequate. As is true elsewhere in the DEIR, there is no complete listing of environmental effects followed by mitigation measures addressed to specific impacts. Instead, impacts and mitigation are lumped together in sections separated from the discussion of the water aspects of the project and setting. I.3.2

The DEIR is most deficient in its treatment of the severe water deficits which would result from the absence of additional State Water Project facilities. The DEIR should discuss the potential impacts of the SWP deficit, which might include cut-backs in supplies and over-drawing from the Central Valley Basin and other impacts. In addition, the DEIR's proposed "mitigation" measures serve only to obscure the unavoidable impacts associated with SWP deficits. Two "mitigation" measures for this impact found in a paragraph underneath a table on p. 5-97 are: (1) delay in actions by the County on the proposed Plan amendment and rezoning; and (2) conditioning these actions to delay further implementing actions by the County until the status of SWP entitlements is clarified, necessary State studies are completed, and the determination is made that an adequate water supply to the project can be assured. The DEIR notes that water conservation and use of treated groundwater and wastewater would not offset deficits occurring if no new SWP facilities are built. Elsewhere in the EIR, a listing of unavoidable adverse impacts does not include water deficits. Apparently, it is assumed that possible delay in approval or implementation of all or part of the project will mitigate the impacts. Yet, as noted above, delay does not qualify as a mitigation measure--obviously any impact will not occur as long as the project does not take place. I.3.3 I.3.4

## B. Wastewater

The greatest deficiency in the DEIR's discussion of the impacts associated with wastewater generation and treatment is its use of a number of unsupported assumptions. Because there are insufficient grounds on which to make such I.3.5

assumptions, the DEIR should analyze the range of impacts which could result in the absence of these assumptions, and should discuss measures to mitigate these impacts. It is insufficient to simply presume that everything will work as planned when there remain so many open questions which could affect the outcome. I.3.6

For example, rather than analyzing hydrologic conditions and wastewater impacts, the DEIR simply states at one point that "[f]ield studies are needed to verify actual groundwater system behavior and to provide a detailed basis for assessing potential groundwater impacts of wastewater application." (DEIR, p. 4-41.) Elsewhere, under a section on mitigation of groundwater impacts, the DEIR lists nine field studies on hydrology that are proposed to be carried out as part of the project, not as mitigation measures. These studies could invalidate a number of assumptions made in the DEIR and could have important ramifications for a wide range of impacts, such as migration of increased amounts of low quality water to the Central Basin, impacts on recreation areas such as Shadow Cliffs and impacts on surface waters. Instead of analyzing a range of potential impacts which takes into account the possible outcome of these necessary field studies, the DEIR simply ignores such impacts.

The DEIR claims that the impacts from potential degradation of downstream high quality groundwater and potential raising of groundwater levels would be minimized by a proposed groundwater management program. Two options are proposed for that program. The first option involves demineralization of wastewater and collection and demineralization of groundwater; the second involves only a groundwater demineralization system and assumes wastewater demineralization would be unnecessary. The DEIR concludes that under either option no groundwater discharge from Las Positas would be allowed to overflow into downstream areas and basins unless its quality was equivalent to or better than that of the downstream areas. Yet, no supporting facts or analysis is provided to ensure that the program can succeed in achieving this goal. Considering the seriousness of these impacts and the great reliance placed on the newly-proposed groundwater management program, more information must be provided to verify the effectiveness and reliability of the program. I.3.7

Furthermore, because the proposed reverse osmosis system is an innovative technology which has never been used full-time on the same scale as proposed in Las Positas, the DEIR should fully analyze the problem of improper functioning. Specifically, the DEIR should discuss the

frequency with which parts or all of the system are expected to break down, the resulting impacts should the system fail to function properly either repeatedly or over an extended period of time, and measures to mitigate or avoid those impacts. J.8.4

In addition, alternatives to the proposed wastewater treatment plan are not adequately analyzed. This is particularly important as the proposed system is contrary to the Regional Water Quality Control Board policy of encouraging consolidation of treatment plants in the Livermore Valley. In particular, the alternatives of export pipeline, groundwater recharge, direct stream discharge, and evapotranspiration all require analysis, yet are glossed over in the DEIR. The export pipeline is especially important since the Zone 7 wastewater management plan requires that a major development like Las Positas explore water export options, including joining with other developers. The export pipeline, acknowledged in the DEIR as the preferable alternative, apparently is not analyzed because of the complexities involved in pursuing it, including the possibility that the East Bay Discharge Authority might reject it. The Authority's recent partial endorsement of the export pipeline further underscores the importance of analyzing this alternative. J.8.5

#### C. Air Quality/Transportation

This DEIR has repeated several mistaken assumptions made in the first EIR, which leads to a significant underestimate of impacts on air quality and transportation systems. For example, the DEIR's assumption that 60% of peak hour and 65% of average daily traffic will be internal to the project is not substantiated by experience in other similar projects. Also, no information concerning the salaries of Las Positas employees is given and correlated with housing prices in order to substantiate the DEIR's assertion that such a large percentage of Las Positas employees (80%) will live within the project. Particularly in light of the many costly special assessments and taxes and other expenses proposed, Las Positas housing may not be affordable to many Las Positas employees. If a larger percentage of employees resides outside of the project, there will be an equivalent increase in external traffic generation. B.2.2  
M.3.1

Furthermore, as in the first EIR, the project's Transportation System Management ("TSM") program is assumed to reduce traffic effects by up to 25%. Even the County's own expert, Ronald Sorensen, Chief of the County Road

Department, noted that this assumption is extremely optimistic. The Bay Area Air Quality Management District also questioned the validity of this assumption absent firm and binding commitments to the program. (See comments on June 1982 DEIR by Alameda County Road Department of the Public Works Agency and BAAQMD.) Since there is no demonstration of firm commitments to all aspects of the TSM program, the DEIR should analyze impacts that would result if a portion or none of the program were implemented. B.2.2  
M.3.1

Where there is uncertainty, the DEIR's analysis should include a worst case. Yet the new DEIR retains these mistaken assumptions and provides no new supporting data for them. Use of worst case assumptions regarding TSM and amount of internal traffic is particularly important in light of the fact that even with the mistaken assumptions, the project will put many roads at or above their traffic capacity, and air impacts from the project will also be significant.

The DEIR also presents misleading and incorrect information regarding the impacts of Las Positas on levels of carbon monoxide, the pollutant with the most significant impact. Table 4.2 indicates that a maximum 8-hour concentration of 7.3 ppm would be reached (the 8-hour standard is 9 ppm). The text states that the levels could be 0.5 ppm higher than that near I-580. Yet these figures apparently assume no CO background levels whatsoever. Thus, the table shows a maximum CO level of 7.3 when in fact the maximum level is 7.8 plus background levels, which could well cause exceedence of the standard. Similarly, Table 4.3 is deceptive in that without justification it excludes background levels of CO which could result in exceedence of the standard.

#### D. Jobs/Housing Impacts

The DEIR appears to conclude that Las Positas will not significantly affect the Project Market Area ("PMA") jobs to housing ratio. (DEIR, p. 5-51.) However, this conclusion is based on faulty assumptions. The DEIR's improper use of assumptions has resulted in a serious underestimate of the number of jobs that will exist in the PMA by 2005 and consequently an inadequate analysis of environmental and fiscal impacts resulting from that job increase. D.3.1

For example, the DEIR's conclusions that construction of Las Positas will not affect the jobs/housing ratio mistakenly assume employment figures based on ARAG's 1979 population projections. The DEIR should instead use far D.3.2



more reliable and accurate employment projections based on those projects already planned or identified for the Primary Market Area. Elsewhere, the DEIR points out that based on those updated figures, 86,100-99,100 new jobs are predicted in the PMA between 1980 and 2000 (apparently excluding Las Positas), far more than the estimate of 37,500-50,000 new jobs for 1980-2005 used by the DEIR in predicting no excess of jobs. 1/ Projections based on the figures on planned and identified employment projects show a shortfall of nearly 20,000 housing units by the year 2005, rather than the excess predicted in the DEIR. 2/ The various impacts of this imbalance must be analyzed in the DEIR. It should be noted that if there remains a question as to which figures are the most accurate, then a worst case assumption should be analyzed, in this case, using the higher employment projections.

The DEIR's failure to analyze a possible significant shift in the jobs/housing balance is further exacerbated by its use of another mistaken assumption. Relying upon a study of the Bay Area region done by Gruen Gruen & Associates which determined the range of indirect job multipliers to be between 1.3 and 1.9, the DEIR chose 1.6, the midpoint of the range, as an appropriate multiplier for Las Positas. Use of an average Bay Area region multiplier for a new town in the Livermore-Amador Valley is clearly inappropriate. Unlike most parts of the Bay Area which are already densely populated and fully serviced, Las Positas is a new town which will create a much greater than average need for secondary jobs. Moreover, the City of Livermore has a much smaller than average retailing base, which further indicates that an especially high number of jobs will be generated by Las Positas. This would warrant use of a higher multiplier, perhaps even higher than 1.9. At minimum, a range of multipliers should be used so that all potential impacts will be analyzed in the DEIR.

Moreover, analysis of the secondary employment of construction activity is improperly excluded from the DEIR. Although it will last for twenty-five years, it is considered "temporary."

1. This section of the DEIR is particularly confusing. It is difficult to discern the precise source of the DEIR's projections since the DEIR makes two 1980-2000 "trend" projections: one based on extrapolation of 1975-1980 trends, and one based on ABAG 1979 projections, using updated 1983 data. (DEIR, p. 5-25, 26.)

### III. Consistency with Public Plans and Policies

#### A. LAFCO

The DEIR states that it will serve to fulfill CEQA requirements for Alameda County LAFCO's action on the proposal to form a CSA for Las Positas. (DEIR, p.1-7.) Therefore, the DEIR must comply with all CEQA requirements with respect to both LAFCO's action on the CSA and the County's action on the General Plan amendment.

The DEIR fails to analyze adequately alternatives to formation of a CSA. In its two-page discussion of alternatives to the CSA, the DEIR fails to compare the relative environmental impacts of the alternatives with those of a CSA. Most importantly, the DEIR fails to analyze adequately the alternative of annexation to the City of Livermore. The DEIR merely notes some advantages of Livermore annexation and states that in 1981 LAFCO refused to include Las Positas in Livermore's sphere of influence. The EIR makes no comparison whatsoever of the environmental impacts of the annexation alternative to those of the CSA.

Apparently the Livermore annexation alternative is summarily rejected because of LAFCO's 1981 decision on the Livermore sphere of influence. Yet, the proposed CSA is on its face far more contrary to LAFCO policies, some of which are set forth elsewhere in the EIR, than would be an annexation to Livermore. LAFCO's stated policy is that "all urban development, wherever reasonable, shall be municipal development." To that end, LAFCO's policies call for annexation to a city rather than formation of a special district if both can provide the same services with approximately the same environmental impacts. Yet, as noted above, the EIR fails to provide the necessary comparison of environmental impacts of the two alternatives.

Other LAFCO policies expressed in earlier actions on Livermore's sphere of influence are highly relevant to Las Positas and should be set forth in the EIR. For example, in its 1979 decision on the Livermore sphere of influence, LAFCO stated that:

"1. Further urbanization of the Livermore area should be limited to development within the Sphere of Influence to provide a balanced use and location of development to assure a sound public economy and healthful environment.

2. Development within the Sphere of Influence should



be encouraged to consolidate urbanization with mutually compatible land uses and living environments based on the City general plan.

3. Urbanization of the area outside the Sphere of Influence of the City of Livermore should be discouraged.

O.3.2  
E.4.1

4. Establishment of Special Districts that provide public service to urban developments that do not have the authority for land use planning should be discouraged."

The proposed Las Positas CSA contradicts each of these policies; annexations to Livermore would comply with each. This further underscores the need to analyze fully the Livermore annexation alternative, particularly in light of all of the policies of LAFCO and of the Knox-Nisbet Act.

Further underscoring the EIR's inadequacy in this respect, no effort was made by those preparing the DEIR to confer with the City of Livermore on the possibility of annexation, discussing its feasibility and relative environmental effects. For these reasons, the DEIR's analysis of the proposal to form a CSA is inadequate.

O.3.3

In addition, the fact that the project contradicts numerous statutory and County LAFCO policies should be set forth as an unavoidable adverse impact of the project and the growth-inducing effect of disregard of those policies should be analyzed.

O.3.4

#### B. Alameda County Planning

CEQA requires that an EIR analyze inconsistencies between the proposed project and the applicable general plan. (14 Cal. Admin. Code § 15142(b).) The DEIR candidly acknowledges that the Las Positas proposal would conflict with almost every major policy guiding future growth in the Livermore-Amador Valley. (pp. 5-56 to 5-67.) However, the analysis falls short of an adequate analysis of the lack of conformity of the proposal with adopted County policies.

First, the DEIR discussion fails to identify the overall impacts associated with massive nonconformance with County general plan policies, as set forth in the Livermore-Amador Valley Planning Unit General Plan. Instead, impacts are individually listed and very briefly discussed. The DEIR should be revised to assess the valleywide impacts (including

E.1.1

other unincorporated developments which may follow Las Positas) associated with general plan amendments which would be required by the project as proposed.

E.1.1

Second, except in one instance (p. 5-59), the DEIR does not analyze mitigation measures or alternatives which could eliminate the inconsistency with general plan policies. The DEIR should be revised to include a discussion whether each of the policy impacts is significant or insignificant and whether it is mitigable or avoidable. Mitigation measures and alternatives should be identified where appropriate.

E.1.2

Third, the DEIR erroneously concludes that there will be no impact on two important policies within the Livermore-Amador general plan. The proposed project is inconsistent with the following policies:

E.1.3

#### "2e. Limit Residential Development in Rural Areas

To limit both the amount and extent of residential development in rural areas and outside municipal or community service areas in order to 1) minimize potential adverse effects of private sewage treatment and disposal systems on local groundwater resources, 2) preserve large tracts of agricultural land, and 3) efficiently provide public services."

#### 8f. Promote Development of Central Areas

To promote the development and redevelopment of the existing central areas of the three valley communities as commercial and business centers through land controls which limit the extent of commercial and business development in other areas, through district projects and programs, and through supportive capital improvements."

The DEIR should be revised accordingly and appropriate mitigation measures and alternatives should be assessed.

E.1.4

Fourth, the DEIR fails to analyze conformance of the project with the countywide general plan. An adequate general plan must be "an integrated, internally consistent and compatible statement of policies" for the County. (Government Code section 65300.5.) Thus, the absence of conformance between the

3. Although a CSA is proposed for the project, the project does present all of the problems addressed by this policy. Therefore, the DEIR should address these issues.

proposed project and countywide policies must be assessed, as well as potential conflict between the countywide plan and proposed amendments to the Livermore-Amador Planning Unit general plan which would be required to facilitate the project. Assessment of inconsistencies with countywide land use and circulation policies is particularly important.

By way of example, the Open Space Element of the County General Plan states that as a means of limiting urban growth and preserving agricultural lands for productive uses, "All areas indicated as cultivated or uncultivated agriculture on the County General Plan are considered as Agricultural Open Space in the Open Space Plan and are designated for permanent retention." (Open Space Element, p. 4; see also p. 13.) The Element also discourages "urban type development" on agricultural lands and requires at least 100 acre minimum parcels on such lands. (Id. at 13.) Lack of conformity with these and other portions of the Open Space Element, including the Open Space Plan Map, should be analyzed.

The proposed project also conflicts with the goals and objectives of the County's Conservation Element, which requires the preservation and protection of agricultural lands, maintenance of the highest air and water quality possible, and the insurance that there will be sufficient water supplies of high quality for all beneficial uses. (Conservation Element at I-88 through I-90.) As Las Positas would be in fundamental conflict with these and similar policies, the inconsistencies must be assessed in the DEIR.

The examples provided in this discussion are without limitation to objections which the City may raise to the absence of consistency of the project with the County's general plan. These comments are intended solely to provide guidance to the County in the preparation of an adequate environmental document.

#### C. ABAG

As discussed elsewhere in these comments, the DEIR should analyze and apply updated information available from ABAG concerning regional employment and housing trends. Those data should be applied to the ABAG plans and policies discussed at 5-70 through 5-72 and appropriate revisions should be made to the DEIR. E.2.1  
D.3.7

#### D. Williamson Act Contract Cancellations and Loss of Agricultural Lands

The DEIR recognizes that the Las Positas area is used for crop cultivation and grazing (pp. 4-14, 5-211). The

technical report on the agricultural potential of the Las Positas area (App. H) observes that a "satisfactory living" has been available to farmers who have farmed other properties as well as land within the Las Positas area, engaged in non-agricultural pursuits, or "occasionally" sold off a small parcel of land (presumably for non-agricultural development). (App. H, p. 1) However, the "budgets" for projected farming in the area do not assume use of any of these techniques. For example, substantial economies in scale may be possible from dry farming or calf raising when done in conjunction with ownership or leasing of several parcels. Income from sale of rural residential parcels from larger ownerships should be included in calculation of profitability of agricultural operations. Accordingly, the budgets and commentaries should be revised. E.5.1

The DEIR is apparently intended to provide the environmental documentation for the County's consideration of pending requests to cancel certain agricultural preserve contracts within the Las Positas area. (DEIR, p. 1-2.) However, the DEIR does not contain adequate analysis of the environmental effects of such cancellations, particularly upon the continued viability of agricultural lands in the vicinity. For example, the DEIR should analyze the viability of continued agricultural operations upon lands within the Las Positas area under Williamson Act contract for which cancellation has not been sought by the landowners. The likely magnitude and timing of pressures for development of those lands should be specifically assessed. The same analysis should be made as to non-contracted agricultural lands within Las Positas. In addition, an identical analysis should be made upon agricultural and open space lands (both under Williamson Act preserve and non-contracted) in the Livermore area for which conversion to non-agricultural and open space uses would increase as a result of the proposed contract cancellations and subsequent development of Las Positas. This analysis should include site-specific identification of lands threatened with conversion. E.5.2

The DEIR contains a cursory discussion of conformance of the petitions to cancel the Williamson Act contracts with both the "window" provisions (Government Code section 51282.1) and the "public interest" grounds for cancellation (Government Code section 51282(a)(2)). (pp. 5-72, 5-73.) It should be noted that the DEIR cannot serve as an adequate basis for assessment of conformance with these statutory standards, since the current draft is incomplete and misleading. E.5.3

First, the DEIR makes almost no effort to assess conformance with the requirement of the "window" provision that



any cancellation and alternative use "will not result in discontinuous patterns of urban development." (Government Code section 51282.1(f)(1).) The City of Livermore disagrees that "existing and planned urban uses in the Livermore-Springtown area" would justify a finding of conformance with this requirement. (p. 5-72.) Even if all Las Positas area landowners participated in the proposed phasing, the project would represent a discontinuous extension of development which available planning studies indicate would be premature. Moreover, the County must analyze the extent to which development of Las Positas at this time would draw development away from areas in Livermore, the Tri-Valley area, and the Bay Area region which have already been committed for development. In addition, the County must assess in detail the extent of noncompliance with the window provisions arising from continued agricultural use or other nonparticipation by landowners within the general plan amendment area with the development plan.

E.5.4

E.5.5

E.5.6

Second, the DEIR should analyze whether these cancellations would be compatible with the purposes sought to be achieved by the Williamson Act and its cancellation provisions, since the relative conformance or nonconformance of the cancellations to Act policies may be taken into account in determining whether the "public interest" test has been met. (See Government Code section 51282(c)(1).) Among the Act's purposes, for instance, is "discouragement of premature and unnecessary conversion of agricultural land to urban uses" (Government Code section 51220(c)) and avoidance of "removal of adjacent lands from agricultural use." (Government Code section 51282(b)(2).) In determining conformance with purposes of the Williamson Act, it should be noted that the landowners seeking cancellation have not sought cancellation pursuant to Government Code section 51282(a)(1), which requires consistency with the purposes of the Act.

Third, the DEIR undertakes no analysis of the availability of "proximate noncontracted land which is both available and suitable" for the proposed project. (Government Code section 51282(c)(2).) This requirement will require analysis of anticipated demand for new industrial uses and housing in the region as compared to currently existing and planned new developments on noncontracted lands which will be available to satisfy the demand. If demand will exceed supply (in the absence of Las Positas), then a survey of noncontracted lands available for these types of uses must be undertaken. These are appropriate matters to be analyzed in the DEIR.

Fourth, a general plan amendment was required to have been initiated prior to January 1, 1982, not January 1, 1981. (p. 5-73.) Government Code section 51282.1(f)(2).)

#### IV. Fiscal Impacts

The major defects in the DEIR's "Fiscal Impact Analysis" are not what is contained in the analysis but what is not contained in it. Most important, the analysis assumes the validity of all of the capital cost estimates provided by the developer as well as those provided by the County, without any independent analysis of these estimates. As the DEIR notes:

"All capital cost estimates for the proposed Las Positas County Service Area (CSA) were initially provided by Wilsey & Ham, acting in their capacity as professional engineers and consultants to the Las Positas Land Company. Some capital cost estimates were provided by public agencies providing services. The EIR team has depended entirely upon these estimates." (DEIR, p. 5-147.)

The DEIR fiscal analysis goes on to point out that the proposed financing program could be vulnerable due to "major underestimates" of these capital costs. The DEIR notes that some of the estimates are "optimistic," several concern innovative facilities where capital costs are not known, and other capital costs such as flood control, which may be considerable, have not even been estimated. (DEIR, p. 5-157.) The DEIR notes that major capital facilities "often cost more than originally estimated," yet the entire fiscal analysis is predicated upon the unverified capital cost estimates made primarily by the developer itself. CEQA requires that important information such as this which is provided by the project proponent and included in the EIR be subjected to full and independent scrutiny.

P.15.1

This flaw alone renders the fiscal analysis of little or no utility since the question of capital costs is fundamental to the entire analysis. Nevertheless, two additional major deficiencies in this analysis should be pointed out. First, the analysis fails to provide accurate and complete information about the costs imposed by Las Positas upon Livermore. Second, the information provided in the fiscal analysis is not correlated with other parts of the DEIR which are directly affected by fiscal matters, such as affordability of housing. (which in turn affects the extent to which Las Positas employees reside within the project and the extent to which the generated traffic is internal or external).

P.15.2

P.15.3



With respect to impacts upon the City of Livermore, the analysis does identify some impacts upon the library, the Livermore Area Recreation and Parks District, and the Livermore Valley Unified School District. Yet, some of the estimated costs to Livermore are inaccurate. For example, the analysis seriously underestimates the cost to Livermore of servicing Las Positas library needs. (DEIR, pp. 5-194-197.) By the end of Phase I, estimated shortfall in circulations to Las Positas residents served by bookmobile will be approximately 66,000 circulations. Las Positas residents will turn to Livermore to supply their library needs. The following mistakes should be noted in the DEIR's analysis of library impacts upon Livermore:

1. Acquisition and cataloging of 1.6 items per capita is \$37.86, not \$16.35 as indicated. (DEIR, p. 5-195.) (This cost is derived by adding together the \$20 per volume cost and the \$3.66 cataloging cost, and multiplying by 1.6.) Thus, the financial impact will be almost double that estimated--\$935,518 instead of \$527,841.

2. Personnel costs of \$121,500.00 over the course of Phase I are omitted but should be shown in Table 5.59. (DEIR, p. 5-195-196.)

3. Expanded storage will cost at least \$40,000 more than the \$100,000.00 estimated, as indicated by a 1982 expansion estimate received by the City. (DEIR, p. 5-195.)

4. The current subvention amount per loan is \$.48, not \$.46. (DEIR p. 5-197.)

Phase II costs, in addition to Phase I costs for the Library System should have been calculated.

Livermore is presumed to be eligible for a State subvention of 46 cents (actually 48 cents) per transaction (p. 5-197) for Las Positas residents. The costs of accumulating the documentation and filing the claims with the State of California for reimbursements would be substantial, but are not mentioned. In addition, the subvention is paid only on the net direct loans made in excess of items borrowed by Livermore residents from other libraries in the State. The present imbalance in Livermore's lending and borrowing is sufficient to make it improbable that Livermore would receive any subvention funds during the first two years of Las Positas.

Currently, there is a significant list of State subventions which have been either completely cancelled or greatly reduced by the State of California (e.g., Motor Vehicle In-Lieu, Mandated Cost Reimbursements, Alcoholic Beverage Licenses, Highway Carriers Business Licenses, Financial Aid to Local Agencies, Reimbursed Sales Taxes). Recent State budget proposals for 1983-84 include further reductions of local agency subventions to the extent that subventions cannot be included in serious long-range financial planning except at great risk. The State Library is unable to guarantee the continuation of the subvention program past that time. The DEIR should analyze the fiscal impacts upon the City using the corrected cost estimates set forth above and assuming that no State subventions are received.

Another questionable proposal to help mitigate the City of Livermore's increased library costs is the possibility of increased local sales tax revenues from Las Positas residents shopping in Livermore. (DEIR, p. 5-199.) No estimate of the amount of the predicted increase in sales tax is included. However, the City of Livermore lacks the average city's retailing base and receives only one-half of the Statewide per capita average in sales taxes (1980-81 Livermore's sales tax: \$34.60 per capita; all cities average: \$69.00 per capita) primarily because Livermore does not have regional shopping facilities. More likely, the residents of Las Positas would join residents of Livermore and shop in the cities of Pleasanton, Dublin, and other communities where retail shopping facilities are highly developed. Therefore, it should be presumed that any additional sales tax revenues for the City of Livermore from Las Positas would be relatively insignificant.

While no impacts are noted after 1991 when the first Las Positas library facility is constructed, it is unlikely that the impacts will disappear at that time. The County Library service planned for the end of Phase I is very similar to that in Pleasanton currently. The City of Livermore often services Pleasanton residents and it is probable that it will receive similar demands from the inhabitants of Las Positas. The County facility will mitigate the impact of continued development, but it will not make Las Positas independent of the Livermore Public Library system for approximately another five years. Difficulty in calculating Phase II costs does not mean they are non-existent, and such costs should be included in the DEIR's analysis.

The DEIR fails to provide any analysis whatsoever of costs in other areas such as fire, police, and road maintenance, all of which will be affected by Las Positas. With respect to fire protection, for example, in the years before Las Positas has its own full fire service, it is likely that Livermore will be called upon to provide services either to Las Positas when the County Fire Patrol is busy elsewhere, or to other County locations when the County Fire Patrol is serving Las Positas. The costs of this service should be estimated and analyzed in the DEIR. P.15.3c

Related to this, the DEIR should discuss the possibility of teaming up with other local fire departments to provide some type of consolidated service. This option could substantially reduce fire protection costs to Valley Fire Departments. The DEIR should also analyze the design and costs of measures to ensure code enforcement, which measures could render construction costs higher than estimated. P.15.3d

Similarly, the DEIR's fiscal analysis omits any discussion of the impacts upon Livermore's police services caused by Las Positas residents. The DEIR acknowledges the existence of the impacts and the absence of mitigation measures (pp. d-e) but fails to analyze them as it should. P.15.3e

Many of the measures proposed to mitigate fiscal impacts of the project, as well as various fiscal aspects of the project itself, will have important fiscal ramifications on the rest of the project which are not, but should be, addressed elsewhere in the DEIR. A myriad of service charges, taxes, and assessments are proposed to offset potential deficits. These include street lighting benefit assessment (p. 5-170), sewer service charges with potential increases (pp. 5-170, 5-199), special police tax (p. 5-190), special fire protection tax (p. 5-190), road maintenance benefit assessment (p. 5-190), Zone 7 benefit assessment (p. 5-193) and other special assessments (p. 5-162), all of which could have a large financial impact on the affordability of housing in Las Positas. The DEIR's analysis of affordable housing should include these potential fiscal impacts. Also, the impacts of these charges on the costs of Las Positas housing, on traffic patterns, and on other environmentally significant matters should be analyzed. P.15.3g

Lastly, some of the revenue estimates in the fiscal analysis appear to be optimistic, based on the City of Livermore's experience. For example, a comparison between the Las Positas General Fund Revenue (Table 5.47 at page 5-173) and the City of Livermore (which is currently approximately the same population as the proposed project) indicates that at least two of the General Revenue Sources for Las Positas appear excessive by a factor of nearly four.

	Las Positas**	Livermore**
General Fines & Forfeits* (annual)	\$197,400	\$ 36,000
Vehicle In-Lieu Fees	633,600	159,000
TOTAL	\$831,000	\$195,000

\* Vehicle code fines are in the Road Fund.

\*\* Shown in constant 1982 dollars.

#### Conclusion

The above comments set forth the major deficiencies in the DEIR noted by the City of Livermore. In these comments, the City has focused on only the most significant problems in the DEIR in order to ensure that these basic inadequacies not be obscured by more minor deficiencies.





RECEIVED  
MAY 19 PM 1973  
ALAMEDA COUNTY PLANNING COMMISSION  
RECEIVED

Alameda County Planning Commission  
399 Elmhurst  
Hayward, California

Commissioners:

Las Positas Land Company has proposed building a new town in the Las Positas Valley of Alameda County. The plan as set forth has shown gross inadequacies in nearly every regard, particularly in the area of financing. Because Alameda County allowed and encouraged us to develop our properties, and we have done so in good faith according to the county's rules. We feel that Alameda County is responsible to the people of Bel Roma-Hay School Roads and feel strongly that this project is going to change our way of life negatively from the very beginning. The following conditions are being set forth and demanded by Bel Roma-Hay School residents in order to protect their homes and financial investments.

Las Positas proponents have stated that the 'normal' thing is for a developer to own all the land he plans to develop. Until this time most residents of the Bel Roma area have not been consulted. It has also been stated that only two of seven new towns in the nation have been successful and those that succeeded had single ownership. A multitude of landlords will not and cannot be satisfied financially through land use or zoning. Therefore, before this plan is approved it must be mandatory that Las Positas Land Company own or have secured options on every parcel in order to allow for a consistent development program.

A.5.6

Bel Roma area residents feel strongly that proposals should be made by Las Positas Land to assure that we do not lose property values. That would enable us to replace our ranchette lifestyle in another suited area of Alameda County, not Contra Costa or San Joaquin - but Alameda County. We have chosen Alameda County to live because of its beauty and convenience. We want a guarantee of our land value - like for like. If our lives are to be disrupted as indicated in this proposal, Las Positas Land must give us a guarantee so that we may continue to pursue our chosen lifestyle, which again we must reiterate, was given to us by Alameda County.

P.17.1

Las Positas Land Company is proposing a County Service Area to be run by the Board of Supervisors, which in turn will increase costs to the taxpayers for support of the CSA for the benefit of one entity - Las Positas Land. The county has already stipulated that it does not know how it will manage the development and financing of new town through the CSA as it has never been done before. The average taxpayer need not be responsible for the added burden of supporting this developer's ideas.

Las Positas Land Company has proposed \$10 million to begin the project, and to be paid back. That figure was raised by 40% during financial study. Original estimates for the entire project have been provided by Wilsey & Ham, proponents. Without proper estimations and without proper preparation for handling, funding and management of the plan, it simply cannot succeed. The affect on taxpayers countywide, not just in the project area, will be substantial because of an added workload on county staff. Since this plan will affect taxpayers countywide, perhaps it should be put to the general electorate in November for a feeling about development-supportive services. That delay in time would also allow for some study of housing needs (apartment versus single family, etc.) for the valley in relation to industry taking place in the western valley.

P.17.4

When someone invests in a project for development or profit there must be an initial investment of funds that are expected to be assimilated but paid back through profits, not through county taxpayers. Las Positas Land has proposed a development and have options to, as they have indicated 2900 acres, and through the sale of that acreage they are going to make their profit. Therefore, the \$14 million is simply an initial investment for that 'profit' they will get in return. They do not need to make a profit twice - once from the sale of their land for development, and once from the taxpayers in the form of payback. Further, the \$14 million does not even appear to be a sufficient amount for a project of this size. For example, the 500+ acre Hacienda Business Park has already put \$40 million into its infrastructure. Las Positas Land is only proposing \$10 million for eight times the land. Perhaps that should be raised to \$80 million, or eight times the money! Hacienda also did not function through a CSA and did not have extensive freeway interchanges to finance. No payback of the minimum \$10 million must be a condition of acceptance of this proposal.

P.17.3

Because the proposal does not adequately explain assessment districts/ special taxes to property owners, residents of Bel Roma-Hay School Roads are opposed to being included in any form of assessment at any time during development until such time as our individual properties are developed. We are not being assessed now, therefore any additional assessment will create a financial burden. You must understand that we want no part of responsibility for development, assessments, land acquisition funds, bonds, etc., for any of this project at any time. We will not fund this developer's project because we did not propose it, were not consulted about it, and want no part of it! Las Positas Land Company is not only proposing that its offering of upfront money be returned totally, but it has been suggested that landowners, whether they develop or not and whether they own hundreds or five acres, pay from the outset an assessment or bond fee using their land as collateral. Let us state emphatically that we may very well not be able to afford those assessments and such action may cause us to lose our homes to further subsidize that developer.

Additionally, we are totally self-sufficient on septic and well systems which were approved by Alameda County, and we are opposed to mandatory hookup to any sewer, water, or other lines made available at any time

prior to development of our properties. We are totally opposed to paying for those facilities even though they may be made available.

There is also some concern as to the possible non-completion of the entire project. Coupled with the alternative suggestion of assessment on land-owners from the 'outset', some questions must be addressed. Who will be held responsible for supporting the project if it fails? Without complete buildout as planned, the new homeowners and businesses will not generate enough revenue to support necessary services. It seems mandatory, therefore, that the county insist on some kind of performance bond so that Alameda County taxpayers as well as Las Positas citizens are not held accountable for developer's default.

We further stipulate that phases must be completed in order and totally. Allowing development to be at least 90% completed in Phase 1 prior to beginning Phase 2, 3 or 4 is in keeping with good planning and proper land management. This would prevent any leapfrog development at any stage and avoid a hodgepodge exploitation of rural area should this plan falter or fail completely.

It is also imperative that when and if this plan reaches the phase in which we are included that our lands be first in line for development. We will not stand for becoming an island amid high density. Once high density encroaches upon us, it will be totally impossible for us to pursue a rural atmosphere in our area. Therefore, early-phase transfer of our land will enable us to relocate and seek the rural lifestyle once guaranteed us by Alameda County. We also feel that our land values will fall for an indeterminate amount of time if high density occurs around us before we are able to sell or develop. Since we have developed our land and have huge investments here, we must be zoned to the highest density in our phase. If this does not occur, we will become an island of parcels unattractive and non-advantageous to any developer and will be stuck in the center of high density and town center. We are in favor of high density for Bel Roma-May School (18.9) and lower density (11.8) around us as shown in the alternative density plan. We are totally opposed to the density ratings as put forth by Las Positas Land in its original proposal. Therefore, we insist that the alternative density plan be adopted if this project is to be accepted.

You might also note at this time that the Bel Roma-May School area was the ONLY populated area that had to be dealt with in proposing such a development plan, and it was zoned to the very lowest density when located at the town center. Does that amount to a slap in the face for the effort we've put here, or a nibble at 'security' that sooner or later our land would be developed? Anyone presenting such a plan shows no consideration for the lives and lifestyles about to be ruined. If the plan could not be layed out in a smooth flowing manner, how can the plan possibly proceed as predicted?

Another condition of acceptance is that Bel Roma Road not become a thoroughfare until such time as the last parcel is developed on this road. A thoroughfare would disrupt what is left of our rural lifestyle and increase traffic, thereby creating potentially dangerous situations to youngsters and livestock in the area.

A further condition of acceptance of this project is a guarantee for keeping our livestock until such time as we choose to sell or develop. County staff and Las Positas Land representatives have said there would be 'no reason' livestock could not remain. We need assurances to that effect. It should be noted, too, that some people in the Bel Roma area not only have animals for pleasure but also for business pursuits. Does the County realize they may be putting these people out of business, particularly if they cannot be relocated in equivalent acreage within Alameda County? The replacement cost of a five-acre parcel will be prohibitive and will cost most of us the lifestyle we've chosen here, not to mention higher taxes and increased building costs.

If approved, this project is going to cause us severe financial burden and a complete traumatic, psychological change in our way of life. Also, there is the question of mental stress, loss of sleep and disrupted lives due to the fact that we have not been consulted or offered a way out of this mess. It is one thing to throw money away, but you cannot and will not throw peoples' lives away. Bel Roma-May School residents moved here intentionally, developed according to the county's rules, and managed to maintain an agricultural atmosphere. We stand to lose our peaceful way of life; and we stand to lose our homes not by our own choice but due to a developer's idea to replan our land using the forceful hand of politics as the final verdict over the land WE bought, WE built, and WE pay taxes for. Nobody has more to lose on this plan than those of us who LIVE here and want to STAY here in our rural environment. Therefore, we emphatically state once again that if Las Positas Land Company wants their plan to go forth as planned, they must own or have suitable options to every parcel involved. They are taking our homes and we must be compensated with similar homes and similar acreage within Alameda County. This must be a first and foremost condition of project acceptance.

We appreciate your anticipated concern for our position in view of the proposal that has been presented to you. We respectfully request the opportunity to submit further comments as the plan continues through processing.

Sincerely,

Ronald R. Diego  
Bernadine S. Lago  
Lina Lee McCallister  
Keith McCallister  
A. J. ...  
Manuel F. Silva  
Jimmie M. ...  
Ethan V. Allen  
William H. Allen  
Richard D. ...

*Not M/Ma Elizabeth R. Hart  
May Swindell Sonny Swindell  
Hugh H. Crume Naomi Crume*

Ms. VanHerbke and Mr. Hart were out of town at the time this letter was presented for signatures but have indicated their support of this letter. Mr. & Mrs. John Emery have submitted a letter addressing these same issues.

cc: Don Excel, Board of Supervisors  
Alameda County Planning Department

Mr. & Mrs. Ron Rago, 4701 Bel Roma Road  
Mr. & Mrs. Keith McCallister, 4700 Bel Roma Road  
Mr. & Mrs. Bill Fields, 4733 Bel Roma Road  
Mr. & Mrs. Manuel Silva, 4757 Bel Roma Road  
Mr. & Mrs. Warren Allen, 4742 Bel Roma Road  
Mr. Keith Cabeceiras, 4721 Bel Roma Road  
Mr. & Mrs. Larry Vardanega, 4681 Bel Roma Road  
Mr. & Mrs. Bob Mori, 4663 Bel Roma Road  
Mr. & Mrs. Raymond Swindell, 3220 May School Road  
Mr. & Mrs. Hugh Crume, 4706 Bel Roma Road





# State of California

GOVERNOR'S OFFICE  
OFFICE OF PLANNING AND RESEARCH  
1400 TENTH STREET  
SACRAMENTO, CALIF. 95814

GEORGE DEUKMEJIAN  
GOVERNOR

May 13, 1983

Bill Allin  
Alameda County Planning  
Department  
399 Elmhurst Street  
Hayward CA 94544

SUBJECT: SCH# 82021602 LAS POSITAS GENERAL PLAN AMENDMENT

Dear Mr. Allin,

The State Clearinghouse has completed review of the subject draft Environmental Impact Report (EIR). Comments from state agencies are attached, and highlighted below. Please contact appropriate agency staff if you have any questions.

## CALTRANS DISTRICT 04

The revised draft EIR does not adequately respond to the July 30, 1982 comments from the Department of Transportation Planning. These comments still remain to be considered and responded to by the lead agency. Of primary concern to Caltrans are the traffic volumes on ramps, intersections at the foot of ramps, freeway segments significantly impacted, and conventional State Highways and their intersections (e.g. Route 84). The cost of any mitigation measures requiring improvements on State facilities will have to be paid for by the developer. If improvement of off-site drainage flood control facilities are required, adequate mitigation measures should be made for future development runoff conditions so that freeway facilities will not be adversely affected.

## S. F. REGIONAL WATER QUALITY CONTROL BOARD

Several comments regarding wastewater management include: the exporting of wastewater as a desirable disposal option; reclamation and reuse of wastewater as an alternative; acreage needed for wastewater treatment; off-site disposal areas; and groundwater control.

## FISH AND GAME

Consideration should be given to diverting and storing peak stormwater flows within the project area. The "complete biological reconnaissance" will be essential to a well planned project. Such a study should be made a condition for approval of this project and certification of this document.

Mr. Bill Allin

2

May 13, 1983

## CALTRANS AERONAUTICS

The proposal has little potential for exposure to significant noise and safety impacts from the airport flight operations.

## HEALTH - Office of Noise Control

The County's noise standards may be inconsistent with the State's Guidelines for Noise Elements, if mitigation measures to reduce outdoor noise levels to less than 60 L<sub>dn</sub> are not implemented.

## State Clearinghouse

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

A 1981 Appellate Court decision in Clary v. County of Stanislaus (118 Cal.App.3d 340) clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted. The responses should indicate any factors of overriding significance which required the suggestions or comments to be rejected. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information. The court further said that the responses must be a good faith, reasoned analysis.

Section 15002 (f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk.

Sincerely,

Ron Bass  
Ron Bass, Director  
State Clearinghouse

RM/ap

cc: Ken Fellows, DWR

Anna Polvos  
Anna Polvos  
State Clearinghouse

RECEIVED  
MAY 16 AM 11:58  
ALAMEDA COUNTY PLANNING  
DEPARTMENT

# Memorandum

Date : MAY 10 1983

To : Ron Bass  
STATE CLEARINGHOUSE  
1400 Tenth Street, Room 121

Subject: Las Positas GPA  
Application -  
Revised Draft  
SCH #82021602

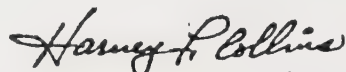
From : ENVIRONMENTAL HEALTH DIVISION  
714 P Street, Room 430  
322-2308

The Department has reviewed the subject environmental document and offers the following comments.

Considering the general nature of the Las Positas GPA, the section on Noise adequately indicates the potential magnitude of the noise impact problem. Table 5.61 (page 5-204) is particularly informative in this regard.

The noise levels at existing and proposed schools continue to be of concern. It is worthwhile to observe that the County's standard of  $L_{dn}$  70 (see the response to comment 70a in Appendix A) for schools, libraries and churches is too high and inconsistent with Section 216, California Streets and Highways Code, which limits noise due to freeways to 50 dBA inside classrooms. The County's standard may also be inconsistent with the State's Guidelines for Noise Elements, if mitigation measures to reduce outdoor noise levels to less than 60  $L_{dn}$  are not implemented. R.1.1

If you have any questions or need further information concerning these comments, please contact Dr. Jerome Lukas of the Noise Control Program, Office of Local Environmental Health Programs, at 2151 Berkeley Way, Room 613, Berkeley, CA 94704, 415/540-2665.



Harvey F. Collins, Ph.D.  
Deputy Director  
ENVIRONMENTAL HEALTH DIVISION

# Memorandum

To : 1. Projects Coordinator  
Resources Agency

Date: May 9, 1983

2. County of Alameda  
399 Elmhurst Street  
Hayward, CA 94544

Telephone: ATSS ( )  
( )

From : Department of Fish and Game

Subject: Draft EIR, Las Positas General Plan Amendment, Alameda County; SCH 82021602

Our personnel have reviewed the subject document and we have the following comments.

The kit fox inhabits grasslands such as those on the study area, not "heavy brush" as stated on page 4-20. We are not convinced that peak stormwater runoff will not increase existing flooding and erosion problems on Arroyo de la Laguna and induce natural resource damaging flood control projects. The statement is made on page 4-21, "... maximum flows from the Las Positas area would not coincide with peak flows in Arroyo Las Positas, such that the increase in the maximum discharge in Arroyo Las Positas resulting from development would be minor." No information is provided concerning timing of peak flows to support this contention. Figure 4.11 shows a flow increase of about 20 percent in Arroyo Las Positas to be generated by the proposal. We consider this a substantial increase which will make more severe downstream problems. Consideration should be given to diverting and storing peak flows within the project area.

The "complete biological reconnaissance" recommendation described in Section 4.2C.3.3 will be essential to a well planned project. The study should consider kit fox, vernal pools, riparian habitat, and sensitive plants. The study should designate natural resource preservation areas utilizing the 635 acres of open space (or more if necessary) allocated. Such a study should be made a condition for approval of this project and certification of this document.

The Department has direct jurisdiction pursuant to Fish and Game Code Section 1601-01 in regard to any proposed activities that would substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any stream. Operators will be required to submit notification of proposed channel modifications pursuant to Fish and Game Code Section 1603. Work cannot be initiated until streambed alteration agreements are executed.

Please send us a copy of the material which will be added to the Draft document in order for it to be certified as a Final EIR. We also request a copy of any construction or use permits that are issued as a result of the determination to certify the document.

1. Projects Coordinator
2. County of Alameda

-2-

State EIR guidelines, Section 15146, require lead agencies to respond to all comments/recommendations received on the Draft EIR and to include them in the final document.

Department of Fish and Game personnel are available to discuss our concerns in more detail. To arrange a meeting, the project sponsor or applicant should contact Mr. Paul Kelly, Wildlife Biologist, telephone (415) 376-8892, or Mr. Theodore W. Wooster, Environmental Services Supervisor, Region 3, Department of Fish and Game, P. O. Box 47, Yountville, CA 94599, telephone (707) 944-4489.

*Ev Toffoli*  
FOR Director



# Memorandum

Mr. Ron Bass  
Executive Officer  
State Clearinghouse  
1400 Tenth St.  
Sacramento, CA 95814

Date: May 5, 1983

File: ALA-580-9.7/4.3  
SCH #8202 1602

Mr. Bass  
page 2  
May 5, 1983

on DEPARTMENT OF TRANSPORTATION - 04  
Environmental Analysis Br.

Subject: DEIR for Las Positas General Plan Amendment and Rezoning.  
Lead Agency is Alameda County.

As stated in our review letter dated July 27, 1982 for the previous project, Caltrans may be a responsible agency for this project. If any work is necessary within the State right-of-way, it is subject to our encroachment permit process. Caltrans would like to forward the following comments and concerns:

1. As we said in our July 30, 1982 comments, Interstate 580 will not accommodate the Las Positas AM and PM peak hour traffic. *M.2.1*
2. The cost of any mitigation measures requiring improvements on State facilities, including freeway ramps, will have to be paid for by the development as there are no proposed projects programmed in the vicinity of this development. *M.2.2*
3. The relationship of this revised DEIR and the original one of 6/18/82 is defined on page 1-3 as a dual one, namely:
  - a. this DEIR is intended to "stand alone", superseding the original one of 6/18/83, and
  - b. both DEIR's, including all comments on both, will be considered by the county.
4. We refer to Caltrans' comments of 7/30/82 (Ann Barkley, DOTP) to the State Clearinghouse, reprinted on pages 195 through 198 of Appendix B. The County's response (item 66a, Appendix A) is limited to noting the need for encroachment permits to work within the state right-of-way. There were no responses to three pages of our comments. *M.2.3*

Some of the changes, from the original to the revised DEIR, may have been prompted by certain of our original comments which were thus rendered moot, while the majority of our comments are still of concrete significance. By the definition of the scope of the two DEIR's (see 3. b., above), our original comments still remain to be considered and responded to by the lead agency.

5. The "Physical Improvements" to roadway facilities noted on pages 5-137 through 5-139 (and parallel cost estimates on pages 5-142 through 5-144) are intended to mitigate the impact of project-generated and cumulative increase of traffic on the network, including State Highway interchanges, and proximate freeway sections.

The data and projected volumes that are supposed to support the extent of these mitigation measures are presented in a piecemeal and uncoordinated fashion which makes evaluation virtually impossible, as shown below:

Table 5.31	Year 2005, "Regional" Peak Hour Volumes, both directions
Figure 5.11	Year 2005, Las Positas AM Peak Hour Traffic, one-way, on-ramps and crossroads of five directly affected interchanges, no Transportation Systems Management (TSM) reductions
Figure 5.12	same as Fig. 5.11 except PM Peak Hour
Figure 5.13	Year 2005, Las Positas PM Peak Hour traffic, with 25% TSM reduction, on mainline segments of the Livermore-Amador Valley network
Figure 5.14	Buildout-North Pleasanton network daily volumes

In order to determine the extent of roadway improvements necessary to mitigate the impacts, cumulative AM and PM peak hour volumes at buildout (2005) should be shown on diagrams covering the significantly affected portions of the network. Such diagrams, or at least the volumes, must be presumed to have been available for the determination of mitigating improvements listed. These integrated support data should be included. Of primary concern to Caltrans are the volumes on ramps, intersections at the foot of ramps (including all turning movements), freeway segments significantly impacted, and conventional State Highways and their intersections (e.g. Route 84). *M.2.4*

6. The "Valley-Wide Traffic Study" is mentioned on page f. Has this been scheduled by the County, or is it contingent upon approval of the Las Positas General Plan Amendment? Would the share for any additional mitigations, which it may find to be necessary, still be assessable to Las Positas?
7. Regarding the concluding statement of the chapter "Roadways", page 5-122, it should be noted that the two inside lanes of I-580 between I-680 and Route 238 are no longer reserved for High Occupancy Vehicles (HOV).

Mr. Bass  
page 3  
May 5, 1983

Mr. Bass  
page 4  
May 5, 1983

8. We noticed an error on line 2 of the third paragraph of our comments of 7/30/82 (Appendix B, page 196). It should read AM, in lieu of PM.

9. Table 5.31, although entitled "Regional Traffic Projections", also includes traffic from one local development, Northbluff. It would be appropriate to tabulate the following separately:

- a. regional traffic projections (i.e. existing plus increments due to regional, Bay Area, growth factors);
- b. cumulative local traffic (i.e. from the Livermore- Amador Valley or Primary Market Area), and
- c. project traffic (Las Positas)

M.2.5

Finally, the combined effects of the three categories could be shown.

A similar approach is frequently, and preferably, used on traffic diagrams, contributed to less equivocal evaluation of the traffic components.

10. The list of Transportation System Management measures (pages 135 through 137) is comprehensive and detailed. However, as recognized by the lead agency, the realization of the objectives depends largely on maintenance and enforcement of commitments by jurisdictions and developers, and cooperation by employees and residents. Since staggered work hours and preferential parking (two of the major peak hour travel reduction measures) are employer-controlled, and since Las Positas would be primarily a residential community, the anticipated 22% reduction factor is probably too optimistic unless development of transit systems, both local and to the major centers of employment, is effectively pursued. These would probably be more amenable to local jurisdictional initiative and control, and specific proposals as to financing, networks, like capacities, patronage estimates, etc. should be evaluated to corroborate a realistic estimate of their model share.

M.2.6

We look forward to reviewing the FEIR. Please send it to our contact person below:

Darnall W. Reynolds  
District CEQA Coordinator  
Caltrans District 04  
P O Box 7310  
San Francisco, CA 94120

If you have any questions regarding these comments, please contact Veda Lewis of my staff at (415) 557-8542.

DARNALL W. REYNOLDS  
District CEQA Coordinator

cc: F.D. Husum (DOTP), State Clearinghouse

VL: ysp

cc: LC, JME, TJW, LN, JB, RDS/DWR, RKD, Chron, File.

on Bass  
Executive Officer  
State Clearinghouse  
400 Tenth St.  
Sacramento, CA 95814

Date: May 5, 1983

File : ALA-580-9.7/14.3  
SCH #8202 1602

DEPARTMENT OF TRANSPORTATION - 04  
Environmental Analysis Br.

Addendum to comments on DEIR for Las Positas General Plan Amendment and Rezoning. Lead Agency is Alameda County.

The following comments were received from our Hydraulics Branch. They should be added to our previous memorandum, also dated May 5, 1983. Additional comments are as follows:

1. Due to the magnitude and complexity of the project covering a 20 year build out period, it would be logically assumed that drainage facilities and/or channel improvement(s) would be constructed incrementally as development progresses. It should be noted that drainage systems as proposed by developers during different phases of the buildout period may potentially become inter-related systems and such work and planning need to be carefully monitored and coordinated with a Master Grading and Drainage Plan for the entire development. If improvement of off-site drainage and flood control facilities are required, where State facilities are to be impacted, mitigation measures should be made adequate for the Q100 storm for future development runoff conditions such that freeway facilities would not be adversely affected.

If you have any questions regarding these comments, contact Veda Lewis of my staff at (415) 557-8542.

DARNALL W. REYNOLDS  
District CEQA Coordinator

cc: F.D. Husum (DOT), State Clearinghouse

VL: ysp

cc: LC, TJW, JME, LN, JB, RDS/DWR, Chron, File.

DATE: 11/18/2011



# Memorandum

To : The Resources Agency  
1416 Ninth Street  
Sacramento, CA 95814

Attn: James W. Burns

Date: May 3, 1983

File No. 2198.C9(SRR)tmf.

From : San Francisco Bay Regional Water Quality Control Board  
1111 Jackson Street, Oakland 94607

Subject: DEIR for Las Positas General Plan Amendment and Rezoning  
Considerations, SCH #82021602

We have reviewed the subject document and have several comments regarding wastewater management, listed below:

1. Export of wastewater is still the most desirable disposal option. Zone 7 is currently evaluating this option further. For this project export should be considered as a potential disposal alternative. Of course we understand that for such a project to serve the entire Valley, another EIR would be required. J.2.1

2. The general concept of reclamation and reuse of wastewater is a good alternative, but the details of the proposal concern us as identified in comments 3, 4 and 5.

3. Table 2.1 indicates that 170 acres of land would be needed for wastewater treatment, but Table 5.30 indicates that only 20 acres would be needed. Why is there a difference? J.2.2

4. On page 5-115 it states that 1470 acres of land will be used for wastewater disposal, and it identifies 1600 specific acres of land to be used for this. The vast majority of this land is made up of 865 acres of parks and open space and 315 acres of public and institutional lands. We question the validity of both of these figures. The second figure implies that 315 out of 420 acres of public and institutional land would be irrigated. One hundred out of the 420 acres would seem to be a better estimate. J.2.3

However, the 865 acres of open space is even more questionable. Both the brine evaporation ponds and the seasonal storage ponds will be located in this open space, but they could occupy as much as 700 acres (seasonal storage ponds). Taking

The Resources Agency

-2-

May 3, 1983

5. The off-site contingency disposal area is still only mentioned in vague terms. This area should be clearly identified and the basis for its use specified. Since the on-site disposal area is apparently designed for average conditions, the off-site area will presumably be used every other year, on the average.
6. The concept of the ground water control proposal appears reasonable, but more details need to be specified before the Regional Board could totally accept it. In particular a complete water balance for the area should be developed, including the contribution of the upstream hill areas.

If you have any questions regarding these comments, please contact Steve Morse at (415) 464-0618 or me at (415) 464-4269.



STEVEN R. RITCHIE  
Associate Water Resources  
Control Engineer

cc: Alameda County Planning Dept.  
Attn: Bill Allin

FILED  
MAY 10 1983  
FBI - SAC, OAKLAND

## Memorandum

Date: April 21, 1983

File:

To: Ron Bass  
Executive Officer  
State Clearinghouse  
1400 Tenth Street  
Sacramento, CA 95814

From: DEPARTMENT OF TRANSPORTATION  
DIVISION OF AERONAUTICS

Subject: Project Review - Las Positas General Plan Amendment - County of Alameda - Revised Draft Environmental Impact Report (DEIR) - SCH #82021602

The proposal is the development (residential, commercial, institutional, recreational) of approximately 4,400 acres north of the City of Livermore. The nearest air facility to the site of the proposal is the Livermore Municipal Airport, approximately two miles to the southwest.

The environmental document indicates that the airport's approach and departure paths (from Runway 07/25) should not significantly impact the Las Positas site, and that the 1975 airport 65 CNEL noise contour is limited to an area within 1,000 feet of the airport runway. The proposed Las Positas development is indicated to lie outside the Airport Land Use Commission's (ALUC) adopted safety and noise zones for the airport. We concur that the proposal has little potential for exposure to significant noise and safety impacts from the airport flight operations.

MARK F. MISPAGE, Chief  
Division of Aeronautics



Dave Nelson  
Environmental Review Section



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT  
1101 CONCANNON BOULEVARD • FIVE RIVERS, CALIFORNIA 94530

INTER-DEPARTMENT COMMUNICATION

DATE: MAY 13, 1983

TO: ALAMEDA COUNTY PLANNING COMMISSION  
ALAMEDA COUNTY BOARD OF SUPERVISORS

FROM: GERALD S. DZAKOWIC, CHAIRMAN, ZONE 7 BOARD OF DIRECTORS

SUBJECT: DEIR-LAS POSITAS

Several issues have been resolved that were originally expressed in Mun Mar's letter of August 2, 1982, Randolph Stone's letter of August 4, 1982, and my letter of August 19, 1982. After review of the responses and the revised DEIR the following concerns remain:

Groundwater Effects

While the report deals with on-site treatment and reuse of wastewater, there is little indication that the developer is receptive to export rather than reuse. Zone 7's Wastewater Management Plan (WMP) states that export is the primary method for the disposal of treated effluent. Export appears to be more cost effective than high level treatment for reuse. While the Zone is exploring an acceptable export solution, potential developers and municipalities with a stake in the results should be underwriting some of those costs, which can get to be fairly high when the study gets beyond the reconnaissance level. Accommodation by EBDA to provide off-peak flow capacity to transport sewage beyond the valley's current export capacity appears promising at this point. J.5.1

The proposed plan to handle rising groundwater needs more development to show that the proposal will work. Data on the subsurface conditions need to be collected before the proposed system could be planned and evaluated. One MGD of dewatering and treatment may not be adequate particularly when you consider that outdoor urban uses in addition to reuse of the treated wastewater will add to the rising groundwater problem. J.5.2 J.5.3

An assessment of the salt balance under alternative modes of operation should also be done to show the expected long term effectiveness of the proposed groundwater management system. While treatment by activated carbon is not expected, it should be noted that an upper cost level could be known. All in all the proposal must conform to the policies of our Wastewater Management Plan. J.5.4

Planning Commission  
Board of Supervisors

- 2 -

May 13, 1983

Water Supply

Water service to the project can be provided directly if desired and if Zone 7 is requested.

Expansion of water treatment and storage facilities will be needed earlier than planned and prepayment of Zone 7 water connection fees may have to be made to provide the financial resources required for such water facilities. This is consistent with the Zone's current operating philosophy that residents of the project bear the cost of additional construction. I.2.1

Water supply from the State Water Project will continue to be questionable but initial estimates of shortfalls of water supply can be met with ground-water supplies pumped by the Zone in "critical" and "dry" years. I.2.2

Flood Control

Added revenues will be needed to finance flood control maintenance associated with Las Positas. The Las Positas CSA should establish a benefit assessment that passes revenues on to Zone 7 for flood maintenance as suggested in the event that a valley wide benefit assessment and proposal by Zone 7 is not forthcoming. K.3.1

The above comments are just ones that come to mind as the document is being reviewed. The project is quite complex, covering many issues and perhaps more issues than time allows for thorough review. Accordingly, these comments should not be construed as final and conclusive.

*Gerald S. Dzakowic*  
for: GERALD S. DZAKOWIC, CHAIRMAN  
ZONE 7 BOARD OF DIRECTORS

GSD:bkm  
cc: Each Member Zone 7 Board of Directors



FEDERAL COMMUNICATIONS COMMISSION

FIELD OPERATIONS BUREAU

San Francisco Region

May 13, 1983

ADDRESS REPLY TO:

211 Main Street - Rm. 537  
San Francisco, CA 94105  
(415) 974-0702

Our reference: Project 74-X-11

Your reference: Draft Environmental Impact  
Report General Plan  
Amendment and Rezoning  
Considerations Las Positas

Gentlemen:

The DEIR has been reviewed by the Commission's local and headquarters' staffs. We wish to submit the following comments for consideration and inclusion in the Final Environmental Impact Report.

As stated in previous correspondence, the project as described in Section 2.0 of the DEIR would have a major adverse impact on the Commission's operations based at the Livermore Monitoring Station. The areas of impact are documented in our March 25 and April 23, 1982, comments regarding your Notice of Preparation of a DEIR and our August 31, 1982, comments to your June 1982 DEIR.

Basically, the major impact is easily discerned by review of DEIR Figure 2.1. The project would require relocation of our monitoring station so that the southern half of our property can be used for industry and the northern half for high density residential (20 D.U./AC) while permitting access for 4-lane arterial roadways, water distribution systems and wastewater collection systems. If the Commission were to retain this site then the proposed land uses would be impossible, while at the same time our operations would present obstacles to some of the land uses proposed for adjacent parcels of land owned by others. The reasons for this statement are well documented in the referenced correspondence to you.

The assumption that the Commission will relocate the site is invalid as evidenced by our plans for a major renovation of the monitoring site during 1984 covering both buildings and structures. The end goal of the renovation is to extend the life of the monitoring site for at least another 35-40 years. The Congressional appropriation committee has given tentative approval for funding of the project.

Alameda County...

-2-

May 13, 1983

The backers of the development have suggested that the Commission sell the land and use proceeds of the sale to fund relocation and construction of a new monitoring site. Cost of such an effort would be at least one million dollars (1981) not including the cost of land at the new site or relocation of employees. The funds would have to be provided in advance so that a new site is constructed and employees relocated prior to disposal of the current site. Federal Property Management Regulations (FPMR) address only the sale of property which is surplus or excess to the agency's needs and does not address sale, lease back, and replacement using funds from sale to a non-government entity, and funds from land sales are usually deposited in the Government's General Fund. Any such action would require the concurrence of the Office of Management and Budget, the Congressional Oversight Committee, and possibly special legislation to have such funds remain in control of the Commission. Any agreement on such a relocation would also include the cost of employee relocation expenses. As a result the County may wish to increase the Sponsor's Advance (DEIR Section 2.7) by 1.5 million dollars to fund purchase of the Commission's property and to cover associated land transfer and development fees. Q.1.2 P.11.1

Our review of the basic DEIR (Summary and Sections 1.0 - 6.0) shows the primary discussion related to the Commission only in Section 5.12 - Land Use. There is no mention of the Commission in Paragraphs 12 and 18 of the Summary covering Fiscal and Administrative topics and Land Use. Within the main report, Fiscal Impact Analysis (Section 5.8) does not address either the impacts of the project on the Commission or the impacts of the project adjusting to Commission's clearly defined intention to retain the monitoring site. Some of the issues are addressed in the Section 5.12 - Land Use; however, it may be prudent to include discussion of the Commission in the Summary as well as address the related fiscal impacts. Q.1.3

Neither version of the DEIR has adequately addressed the impact of the Commission's Rules and Regulations covering protection for FCC monitoring stations (DEIR Appendix E). These rules protect the monitoring stations from harmful interference by radio transmitters authorized by the Commission in the vicinity of the monitoring stations. These rules could present obstacles to licensing radio stations in the Las Positas area such as those operated by public agencies, private individuals, or private business. DEIR Appendix E includes a sample of these Rules; however, other Rules, such as those in Parts 15 and 78, address many other devices, such as power lines, computers, and Cable TV systems. Q.1.4

The project alternatives discussed in Section 7.0, specifically 7.5, are more compatible with our land use from a physical aspect, since the alternative plan revises both land use designations and eliminates sections of new roadways proposed to cross our property. However, the land uses proposed for adjacent parcels are incompatible with our land use for the reasons documented in previous correspondence. The addition of brine evaporation ponds causes some concern, especially the pond to be Q.1.5

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Alameda County...

-3-

May 13, 1983

located south of Hartford Avenue. This pond would be located sufficiently close to our direction finder (DF) to potentially affect its accuracy. The industrial buildings could affect the operation of the DF either by exceeding the vertical clearance angle required by the DF, or the associated industrial uses would generate various types of radio-frequency (RF) noise which would adversely impact DF sensitivity. RF noise emanating from vehicles operating on the streets which would bound our property on most sides would decrease the sensitivity of our receiving systems and thereby compromise some aspects of our daily operations. Signals emanating from computers which would undoubtedly be used in the industrial, as well as the town commercial center and the areas designated for office use, also would adversely impact our operations. Conversely, the operation of our HF radio transmitter could degrade the operation of radio receivers in home entertainment equipment, computers, and other electronic equipment located in close proximity of the transmitting antenna.

A final point of concern is the ground water level. Any aspects of the project which would drastically increase the ground water level may have an adverse impact on our antenna installations and building by possibly causing movement of the supporting structures. Q.1.6

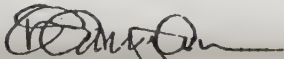
Our past experience has proven that our use is compatible with some forms of urban development. One monitoring site was protected by the provision of open space along the boundary to mitigate certain problems. Additionally, encumbrances on the title of adjacent land has been used to protect our direction finders as a zoning compromise. Q.1.7

The land uses as proposed in the DEIR are incompatible with the operation of our monitoring station. If the project is adopted, the project developers must be required, at the onset, to set aside funds to cover costs associated with modification of our existing plant to accommodate the problems encountered with the project or, in the worst case, to cover the total costs of relocating the monitoring station and its personnel. We must insist that costs of such action be borne by the project developers, not the public or the Federal Government. Q.1.8

Should you have any additional questions, please contact my local representative:

Thomas M. Van Stavern, Engineer in Charge  
Livermore Monitoring Station  
P.O. Box 311  
Livermore, CA 94550  
(415) 447-3614

Very truly yours,



R. I. Vaughan  
Regional Director



OFFICE OF THE  
AUDITOR-CONTROLLER

1221 OAK STREET, OAKLAND CA 94612

DEPARTMENT OF PUBLIC  
AUDITOR-CONTROLLER

HIRO FUJIMOTO  
Chief Deputy Auditor

PAUL J. CONNELL  
Assistant Auditor

RECEIVED  
MAY 16 AM 11:50

MEMORANDUM

TO: WILLIAM FRALEY, DIRECTOR, PLANNING DEPARTMENT  
FROM: HIRO FUJIMOTO, CHIEF DEPUTY AUDITOR  
SUBJECT: DRAFT EIR FOR LAS POSITAS PROJECT  
DATE: MAY 13, 1983

As agreed to in last weeks meeting by various County department representatives, I am submitting the following comments on the draft EIR for Las Positas Project.

Sponsor's Advance

The project sponsor is to advance the CSA or County \$14,000,000., the repayment, of which, is projected to occur after year 2002 from surplus land and development fees.

Clarification as to the extent of County's liability to repay the loan would appear to be essential. Can the repayment be made the exclusive obligation of the CSA, or will the County be contingently liable regardless of what the terms of the loan provide? P.16.1

Clarification may also be needed as to what legal requirements may be applicable to the incurrence of such long term debt by a CSA or County. P.16.2

School Construction Financing

School construction costs comprise one-third of the capital improvement costs of the entire project, and are a major contributor to the projected fund balance deficits in the Capital Improvement Fund. It is therefore important that the various proposed methods of financing school construction be clearly conceived.

It appears clarification is needed in each of the financing alternatives as follows:

William Fraley

-2-

May 13, 1983

1. Proposed Fee Financing: Additional funds will be required in seven of twenty years to meet capital improvement costs. The source of the additional funds needs to be determined.
2. Special Assessment District: Has this method ever been used to finance school construction in California? If not, legal clarification may be desirable.
3. Community Facilities District: The provisions of the act providing this new financing mechanism are unclear. The question of County's contingent liability in the event of default is a concern.

Alameda County General Fund Analysis of Revenues (Table 5.47)

Property tax and property transfer tax revenue amounts shown in Table 5.47 appear reasonable in relation to projected development. A slowdown of development will cause a proportionate decline in the annual growth of both taxes. We did not review any of the other sources of revenues included in the table. P.16.3

Increased Administrative Workload

Establishment of special assessment districts or the levy and collection of benefit assessments and special taxes with property taxes will create additional administrative workload on the Auditor-Controller's Office. At post-buildout, more than 18,000 units would be charged for police and fire protection, road maintenance and street lighting. P.16.4

Some of the items included in this memorandum may have already been addressed. Please let me know if you wish further clarification on any of the comments.

HF:wr

cc: Jeff Campen, CAO  
Roland Mayne, LAFCO

0248E



# WILSEY & HAM

1015 F. Hillsdale Blvd./Foster City, CA 94404  
(415) 349-2151

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San Mateo, CA 94402-0099

1015 F. Hillsdale Blvd./Foster City, CA 94404  
P.O. Box 11  
San Mateo, CA 94402-0099

May 13, 1983

Mr. William H. Fraley  
Planning Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

Re: Comments on the Las Positas RDEIR, March, 1983

Dear Bill:

Enclosed with this letter are comments on the following RDEIR Sections:

- 5.1 Employment and Economic Conditions
- 5.2 Population and Housing
- 5.3 Public Services
- 5.6 Public Utilities
- 5.8 Fiscal Impact Analysis (Comment by Gruen Gruen + Associates)

## Appendix B

In addition to these specific comments, we request on behalf of the Las Positas Land Company that the Fiscal Impact Analysis prepared for the first DEIR (June, 1982) by Gruen Gruen + Associates be included as comments on the RDEIR, and be recognized as part of the set of technical studies supporting the RDEIR.

It is requested that the following changes be made to the Plan Diagram Figure 2.1: **A.3.1**

1. The Rod and Gun Club property be excluded from the General Plan and other considerations. See letter by Jack Smith of July 26, 1982.
2. Assessor's Parcel No. 99B-4500-4 be included in the General Plan and other considerations, and be given a designation of residential at 2 du/acre. See letter by Roy Towers of July 29, 1982.
3. The westerly portion of parcel 99B-4200-1 be included in the General Plan and other considerations, and be designated as a contingency disposal area. See letter by Lee Ham of August 3, 1982.

Mr. William H. Fraley  
May 13, 1983  
Page Two

4. The following properties along or near Del Roma Road be designated residential at 20 du/acre.

99B-4600-05  
06  
07  
08  
09  
10  
11  
13  
14  
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16  
17  
18  
19  
99B-4600-2-6

Thank you for the opportunity to review the document.

Regards,

WILSEY & HAM

*John C. Spencer*

John C. Spencer, AICP  
Associate  
Manager of Planning Services

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# WILSEY & HAM

571 SW Eleventh Avenue / Portland, Oregon 97205  
(503) 227-0455

July 2, 1982

William Fraley  
Alameda County Planning Dept.  
399 Elmhurst Street  
Hayward, CA 94544

Re: Las Positas DEIR

Dear Bill:

It has been brought to our attention that amendments are necessary to Figure 5.6 - Parcels Proposed for Williamson Act Cancellation.

1. Parcel X-62 has had a petition for cancellation from the Williamson Act filed before May 31, 1982.
2. Parcels Y-37 and D-10 are in the Williamson Act.
3. The note in the legend should read that all cancellations were filed by May 31, 1982.

Please advise the appropriate parties of this correction.

Sincerely,

WILSEY & HAM

*John C. Spencer*

John C. Spencer, AICP  
Associate

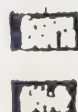
JCS:kk  
cc: Len Han  
Roy Towers

Parcel Petitioned for  
Cancellation

Parcels in  
Williamson Act

## PARCELS PROPOSED FOR WILLIAMSON ACT CANCELLATION

FIGURE 5.6

- 
- PARCELS FOR WHICH PETITIONS FOR CANCELLATION FROM THE WILLIAMSON ACT WERE  
FILED BY ~~6/30/82~~ MAY 31 1982
- OTHER PARCELS IN WILLIAMSON ACT

100 San Ramon Valley Blvd.

• POST OFFICE BOX 118  
• DANVILLE, CALIFORNIA 94526  
• TELEPHONE 418-937-4848

July 29, 1982

Alameda County Planning Commission  
399 Elmhurst Street  
Hayward, Ca. 94544

Re: Las Positas General Plan Amendment Consideration  
Assessor's Parcel No.: 998-4500-4

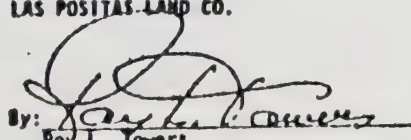
Honorable Planning Commissioners:

Pursuant to Mr. Richard L. Greene's letter dated June 30, 1982, to the Planning Department, we would concur that all of Mr. Howard L. Johnson's property should be included within the Las Positas General Plan Amendment consideration area, and further concur that two units per acre would be appropriate for all of the property.

Your consideration and approval would be most appreciated.

Very truly yours,

LAS POSITAS LAND CO.

By:   
Roy L. Towers

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ALAMEDA COUNTY PLANNING  
DEPARTMENT



# WILSEY & HAM

5411 Eleventh Avenue / Portland, Oregon 97205  
503 227-0435

August 4, 1982

William Freley  
Planning Director  
Alameda County Planning Dept.  
399 Elmhurst St.  
Hayward, CA 94544

Re: Draft EIR - Las Positas Project

Dear Bill:

In reviewing the Draft EIR we noted that references to several background papers and reports were not explicitly made a part of the report. We request that the following reports and papers be incorporated by reference as part of the EIR. The planning department has been furnished with at least one copy of each reference.

Conceptual Wastewater Management Plan for Las Positas Development, Alameda County, California. Lowry & Associates, Feb. 1982.

Preliminary Analysis Potential Groundwater Impacts Proposed Wastewater Management Plan, Las Positas. Alameda County, Calif. Cooper & Clark, April 14, 1982.

Geotechnical Consultation Review and Update of Previous Geotechnical Services, Northern Las Positas Valley. Cooper & Clark February 15, 1982.

Supplemental Information on the Air Quality Analysis for the Las Positas EIR. Wilsey & Ham, May 1982.

Technical Report: The Agricultural Potential for the Las Positas Properties. A.D. Reed, Agricultural Economist, January, 1982.

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ALAMEDA COUNTY PLANNING  
DEPARTMENT

Page 2

Various memos and copies of correspondence with service agencies establishing levels of service, service costs and revenues received for providing services to Las Positas.

Thank you.

Sincerely,

WILSEY & HAM

*John C. Spencer*

John C. Spencer, AICP  
Associate

JCS:kk

cc: Lee Ham  
Dart Echeverria

## COMMENTS ON THE LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS

### SECTION 5.1 - EMPLOYMENT AND ECONOMIC CONDITIONS

#### Employment Projections: Las Positas PMA

The discussion of employment projections beginning on page 5-16 and the selection of "trend" projections as the basis for analysis conflicts with the actual development activity currently underway within the Primary Market Area. The estimated employment growth resulting from Phases I and II of the Hacienda Business Park alone equal the total year 2000 employment growth for the entire PMA as projected by the "trend" methods. As summarized in Tables 5.8b thru c, some 48 additional industrial/commercial projects have been announced/identified in the PMA. Clearly, any employment forecast based on trends from 1975 to 1980 do not reflect the actual pressures for employment growth which have occurred since 1980. D.2.1

As discussed in the RDEIR, The ABAG Projections 79 employment forecasts significantly underestimate employment growth within the PMA as well as the remainder of the region. Without a discussion of the assumptions and methodology used to revise the Projections 79 numbers, it must be assumed that the Primary Market Area is still considered a "bedroom" community for the remainder of the region. As discussed in the Adjusted Growth Rates Trend Projections, the adjusted ABAG projections estimate that regional employment growth will be 100% greater, and East Bay 75% greater than the original Projections 79 estimates. By simply applying this new growth rate to the old Projection 79 forecasts (as is done for the Adjusted Growth Rate Trend Projections) the role of the PMA remains unchanged relative to the rest of the region; that is as a bedroom community for the Bay Area. This assumption is clearly unreasonable given the actual commercial/industrial employment growth now underway in the PMA. In light of the development pressures and announced projects in the PMA, it appears unreasonable to assume that employment growth will be experienced at an East Bay or even regional average growth rate.

Employment forecasts as discussed on page 5-19 of the RDEIR appear to be the most realistic given the current development and project formation activity now underway in the PMA. These estimates show a 86,000 to 99,000 increase in PMA employment between 1980 and 2000. These figures represent approximately 8 percent of the ABAG revised forecasts for the region and 33 percent of the forecasts for the East Bay Counties.

#### Impacts

The basic employment growth allowed for in Las Positas would in no way constitute a net increase in employment to that otherwise projected for the PMA. These employment areas would result in a redistribution of basic employment growth within the PMA. Vacant business park land in Las Positas would compete with vacant lands appropriately zoned throughout the PMA. The supply of vacant land would have the effect of keeping land prices relatively low, thus reinforcing the PMA as a competitive area for commercial/industrial development relative to the rest of the region. D.2.2

### Section 5.2 - Population and Housing

#### Projected Conditions

Future housing needed in the PMA to serve local employment growth is based on the "trend" employment projections discussed earlier. We believe these trend projections are based on unsound assumptions and do not reflect the actual employment growth currently being planned for the PMA. Employment projections approximating the Announced/Identified Projects Forecast should be assumed for the PMA, and should form the basis for analyzing housing demand in this section of the RDEIR. D.2.3

To assess potential demand for housing within the Primary Market Area, two factors should be examined; first, ongoing demand associated with economic growth elsewhere in the region, in light of the area's historic role as a "bedroom community"; and second, demand associated with significant increases in projected new employment growth in the PMA.

In the first case, demand for new housing in the PMA due to the area's continued role as a housing reservoir for the remainder of the region is estimated using ABAG's 1979 housing forecasts. These forecasts are based on the assumption that the PMA will continue as a housing reservoir, with local employment growth being primarily local serving jobs. It is reasonable to assume that the PMA will continue to be a housing resource for the rest of the region, but that the percentage of the total local workforce employed locally will increase. The basis for this assumption is that as employment growth within the PMA substantially increases over the ABAG '79 forecasts, some of the jobs ABAG expected local resident would be commuting to will actually be located in the PMA. D.2.4

In the second case, demand for local new housing will increase as local employment opportunities increase. This stimulus for housing growth will be somewhat independent of the region-wide forces which have and will continue to stimulate local housing growth.

Historically, the PMA has been a net exporter of labor; that is, the number of employed residents has exceeded the number of local job opportunities, and the majority of employed residents have commuted to employment centers elsewhere in the region. A recent survey completed by Gruen Gruen + Associates<sup>1</sup> suggests that in 1980 there were approximately 38,850 workers from the PMA (referred to as Tri Valley in the survey report) commuting to jobs outside of the PMA. As shown in Table A, this suggests that in 1980 approximately 57% of the households residing within the PMA were supported by jobs outside of the PMA. In calculating this percentage, a worker's per household factor of 1.35 was used. Shown in Table B are the 1980 workers per household and jobs to housing ratios for a number of Bay Area communities. As can be seen, Pleasanton and Livermore have ratios of 1.17 and 1.18 workers per household, respectively. Presuming these ratios will change to become comparable to other more established communities over time, an estimate of 1.35 workers per household provides a conservative estimate of housing demand. Additionally, in support of applying a 1.35 ratio, the GGA survey reported 1.52 workers per household within the PMA and 1.27 within a slightly larger study area (including central Contra Costa County and the East Bay Corridor). A factor of 1.35 lies between these two figures. D.2.5

<sup>1</sup>"A Survey Analysis of the Employment, Demographic and Housing Characteristics of the Hacienda Business Park Labor Pool."

TABLE A

Housing Demand Created in the Primary  
Market Area by Persons Working Elsewhere

	1980	2000	1980-2000
Total Households <sup>1</sup>	50,670	86,942	36,272
Out commuters (workers)	38,850 <sup>2</sup>	58,686	19,836
Households supported by out commuters <sup>3</sup>	28,777	43,471 <sup>4</sup>	14,694
Households supported by out commuters Total Households	57%	50%	

<sup>1</sup> ABAG Projections '79.<sup>2</sup> G. G. & A. A. Survey Analysis of Employment, Demographic and Housing Characteristics  
of the Hacienda Business Park Labor Pool.<sup>3</sup> Assumes 1.35 workers per household<sup>4</sup> Assumes 50% of all households in year 2000 will be supported by jobs outside of the  
PMA.

TABLE B

JOBS/HOUSING BALANCE  
SELECTED CITIES: 1980

	(A)	(B)	(C)	(D)	(E)
City	Occupied Housing Units	Employed Residents	Workers Per Hous- Hold	Total Employ- ment	Jobs/ Housing Ratio <sup>1</sup>
Pleasanton <sup>1</sup>	11,665	13,648	1.17	6,446	.55:1
Dublin	4,469	5,229	1.17	2,458	.55:1
Livermore	16,637	19,632	1.18	10,384	.62:1
Fremont	45,486	62,771	1.38	38,285	.84:1
Hayward	35,870	49,501	1.38	47,321	1.32:1
San Leandro	28,086	33,703	1.20	41,671	1.48:1
Concord	37,206	47,996	1.29	30,398	.82:1
Palo Alto	26,400	30,360	1.15	80,196	3.05:1
Livermore Valley	1,461	1,746	1.18	10,299	6.95:1

<sup>1</sup> Pleasanton and Dublin were derived from the ABAG figures (which group the two  
communities together) by allocating numbers to each according to population figures  
1980 Census (Pleasanton = 72.3%).<sup>2</sup> C = B ÷ A<sup>3</sup> E = D ÷ A. If E > C it is a stable community that is neither a net importer nor exporter of  
labor. Cities with scores greater than column (c) are net exporters of labor while cities  
with lower scores are net importers.Source: ABAG Projections '79 U.S. Bureau of the Census, 1980 Preliminary Census  
Counts; Gruen Gruen & Associates.



It is reasonable to assume that the PMA will remain an attractive place of residence for persons employed elsewhere and thus, housing demand from this source will continue relatively independent of the housing demand created by new local employment. In Table A, projections for the year 2000 assume a slight decline in the proportion of households with workers commuting outside of the PMA (from 57% to 50%). The projections are based solely on ABAG's forecasts for the area, which did not account for the great increase in local employment now occurring in the PMA. By the year 2000, out-commuters are estimated to represent a demand for approximately 43,500 housing units within the PMA. This is a net increase of approximately 14,700 units over existing stock. D.2.6

The other half of the housing demand equation is the demand created by the influx of new jobs into the area. Not all local jobs would be held by local residents. It is assumed that approximately 60 percent of the new jobs would, while 40 percent would be held by persons residing outside the PMA. Thus, of the 90,000 new jobs in the PMA over the next 20 years, approximately 53,000 would be held by local residents. Applying a factor of 1.35 workers per household yields a housing need attributable to PMA employment of 39,000 units. Combining this demand with the housing demand from out-commuters yields marginal housing need of 53,700 units. As discussed in the DEIR, current plans and policies provide for approximately 33,700 new units over the next twenty years. This is a housing "shortfall" of approximately 20,000 units. As previously indicated, this projection would assume: D.2.7

- No significant change in the PMA's role, reflected in the ABAG projections, as a place of residence for a significant number of workers who would be commuting to jobs outside the area (net demand for approximately 14,700 new units in the PMA between 1980 and 2000).
- A major increase in demand for housing results from an assumed significant increase in the area basic and local serving employment totaling, by 2000, approximately 90,000 new jobs (net demand for approximately 39,000 new units).
- No significant change in local residential development policies with only minor adjustments reflecting ongoing changes in household sizes (net increase to housing supply approximately 33,700 units between 1980 and 2000). Note that this is an optimistic estimate of housing supply because it assumes 100% of all vacant residential land would be developed. This would never happen if the amount of vacant residential land remained fixed. More likely, 50 to 75 percent of the vacant land would develop, resulting in considerably fewer new housing units in the PMA.

As previously indicated, the current estimates provide a very rough estimate of relationships between available housing in the PMA and future demand. Adjustments in the assumptions used in the current estimates, as well as adjustments in local land use policies affecting both employment and residential development (not to mention changes in regional, state and national demographic and economic trends) could significantly alter the results. D.2.8

#### Impacts

Based on the previous discussions, the impact of Las Positas would be to provide approximately 13,500 new housing units within the PMA by 2000. These new housing units would meet 67% of the expected housing shortfall caused by local employment growth in the PMA. D.2.9

#### Section 5.5 - Public Services

##### Recreation

The DEIR (pg. 5-84) states that Las Positas would have a significant impact upon the East Bay Regional Park District, although the project site does not lie within the district boundaries. Thus, Las Positas residents using EBRPD parks will do so free of costs. It cannot be denied that Las Positas is likely to have some impact on the EBRPD, but there is a question as to how significant that impact will be.

The Las Positas plan calls for a large amount of acreage devoted to community and neighborhood parks as well as large bands of open space. These will provide numerous recreational opportunities near home. In addition, Las Positas is located at the eastern edge of the Bay Area urbanization. To the north and east are vast open areas unlikely to develop for quite some time, if ever. It is likely that Las Positas residents will turn to these areas for the same experience they would get in an EBRPD park. Thus, the assumption in the DEIR that all of Las Positas would be using EBRPD parks seems unrealistically high.

##### 5.6 - Public Utilities

Wastewater Management, Preliminary Area Requirements, pg. 5-115

Please include in the land area identified for irrigation the 135 acres shown on Figure 2.6 as a contingency disposal area. In addition, note that additional areas outside the proposed project development area could also be used for irrigation purposes: portions of parcel 99B 4500-4 and 99B 4200-4-8 as shown on Figure 5.17. Furthermore, the typical storage ponds, as shown on Figure 2.7, could also be used for irrigation during the dry seasons as the ponds would only be filled during the wet season when irrigation would not be possible. J.7.1

#### Appendices

In reviewing the Appendices (A and B) to the revised DEIR, we have noted that several previously requested changes have not been made. Copies of our letters have been included. These requests are summarized below.

Appendix B, page 32

Parcel X-62 has had a petition for cancellation and should, therefore, be shaded. The legend should be amended to read May 31, 1982.

Appendix B, page 67

All of parcel 99B-4500-4 should be included in the Las Positas General Plan Amendment. The designation for this parcel should be 200/acre.

Appendix B, page 135

The following references should be included in the bibliography:

Preliminary Analysis Potential Groundwater Impacts Proposed Waster Management Plan, Las Positas, Alameda County, Calif., Cooper & Clark, April

Geotechnical Consultation Review and Update of Previous Geotechnical Services,  
Northern Las Positas Valley. Cooper & Clark, February 15, 1982.

Supplemental Information on the Air Quality Analysis for the Las Positas EIR.  
Wilsey & Ham, May 1982.

Technical Report: The Agricultural Potential for the Las Positas Properties. A.  
D. Reed, Agricultural Economist, January, 1982.

COMMENTS ON THE RDEIR FOR LAS POSITAS: FISCAL SECTION

COMMENTS ON THE FRAMEWORK OF ANALYSIS

Background

The analysis of fiscal impacts, like the analysis of all other impacts, addresses the changes in a particular place or situation that would occur if a specific action were implemented. The proper analysis of fiscal impacts must therefore meet two requirements: (1) it must identify the changes that would occur as a result of the proposed action and (2) it must isolate the changes attributable to the project from changes expected to result from other actions or events. P.10.1

The changes that would occur as a result of the proposed project may be examined in different ways. One approach, which is used in the RDEIR, is to identify the total changes in costs and revenues that would result. A second approach is to evaluate those changes in terms of net costs and revenues per capita. This latter method indicates whether the county (in this case) would experience a positive or negative impact per unit of population served.

Specific Comments

Page 5-159 (Financial Burden): That carrying costs of infrastructure will have to be borne by developers/ P.10.2

builders rather than homeowners is an impact of Proposition 13, not of this project or financing plan, and is common to virtually every new project.

Page 5-161 (Mitigation Measures): The first two impacts identified - (1) the burden of capital costs on landowners and (2) the pass-forward of capital costs to residents, financed at private market mortgage interest rates - are characteristics of any project built since the passage of Proposition 13. Technically, these impacts of the project are not fiscal impacts, since they do not affect public treasuries, and should not be addressed in this section of the RDEIR. If they are to remain in this discussion, it should be noted that they are impacts of Proposition 13 rather than of this project and that they will occur in any new project. P.10.3

Page 5-172 (General Fund): Paragraph 4 states that because no additional state aid for health services is expected, new residents will generate no new revenues for these services and therefore local costs are expected to exceed revenues available for future population by \$48.95 per capita per year. In reality, it is unlikely that state funding will be tied to the population as of a certain date; in contrast, it is more likely that per capita funding levels will decline. The impact of reduced state aid should not be confused with the impact of new population. P.10.4



states that revenues from taxes on gasoline and diesel fuels are redistributed to counties based in part on the proportion of countywide assessed valuation that is located in unincorporated county area. Based on this criterion, Las Positas would cause an increase in the County's share of these revenues on a per capita measurement.

Pages 5-183 and 5-184 (Vulnerability): Most of this P.10.6

section of the analysis tests the impacts of actions other than the development of Las Positas on the County budget. To portray a true and complete picture of the impacts of Las Positas, the analysis would have to project the financial condition of the County given these changes - reduced motor vehicle in-lieu revenue, increase in general government cost equal to an allowance for contingencies and elimination of federal revenue sharing - both with and without the project, and then compare the two conditions.

The issue raised at the beginning of this section - that is, the impact of a reduction in state and federal funding for health and welfare programs - is P.10.7

NOT carried through the rest of the section. In fact, Las Positas would most likely have little impact on the county's health and welfare costs, because people who can afford to purchase new homes will not qualify for welfare and will generally seek private health care in preference to taking advantage of county services.

Finally, the RDEIR states, "It is unlikely that a worst case would ever occur because if such conditions were imposed, the County would most probably P.10.8 adjust County-wide service standards, eliminate services, etc." Consistent with this statement, an examination of past trends in state and federal shared revenue availability and local levels of service would probably indicate that the two vary directly. It is highly unlikely that existing levels of spending would or could be maintained if subventions were cut, just as it was impossible to maintain existing levels of service after Proposition 13 was passed.

On the other hand, it should be recognized that Las Positas will create a property tax base that is much greater than the existing base in that location and generate greater property taxes per capita than the current average in Alameda County. A very general but realistic comparison of net revenues and costs must recognize that, other things being equal, the level of costs incurred per capita in Las Positas

will be equal to or less than the average cost per capita countywide while the average revenue per capita must equal or exceed the average revenue countywide. The development of Las Positas will not in itself cause the reduction of state and federal subventions, and therefore the impacts of such reductions should not be charged as impacts of the proposed development. P.10.8

#### COMMENTS ON THE UNDERSTANDING OF THE PROPOSED FINANCING PLAN

##### Background

The proposed financing plan, described on pages 2-11 through 2-14, relies on several fundamental mechanisms:

- The collection of a land acquisition fee at the time each final subdivision map is filed;
- The collection of development fees to fund capital improvements at the time building permits are issued;
- The provision of new capital facilities on an as-needed basis, anticipating new development by one year; and
- The deposit of a sponsor's advance to cover the costs of capital improvements needed before any development can occur and during

the first two years of the project. The sponsor's advance would be paid back over time as surplus development fees become available.

The RDEIR fails to recognize the linkage between occupancy of Las Positas and the construction of new capital facilities. If buildout occurs at the rate hypothesized in the RDEIR, then the capital improvements will be provided at the rate indicated in the document as well (except for modifications noted on pp. 9-13 of this memorandum). If, however, market conditions or other factors inhibit the rate of occupancy and development in Las Positas, then the rate of capital improvements construction will also be inhibited because new facilities will not be needed. As the plan is proposed, the maximum exposure on capital expenses would be one year. P.10.9

##### Specific Comments

Page 5-153 (Fund Balance): This section fails to recognize the link between development and capital expenditures described above. Paragraph 1 states, "For this financing plan to work without producing fund deficits, careful coordination would be required between development phasing, sales programs and the capital improvement construction". This careful coordination is actually an intrinsic part of the development proposal, just as it is for any large-scale project. P.10.10

Page 5-157 (Vulnerability): Paragraph 1 warns that needs P.10.11  
for major capital improvements could come at a time  
of development slowdown. This statement reveals a  
misunderstanding of the proposed financing program.  
The program is based on the premise that capital  
improvements will be constructed as needed. The  
process envisioned is that the development of each  
new subdivision or project will begin with construc-  
tion of the additional capital facilities needed for  
that project and conclude with the construction of  
buildings or other facilities. Thus, if a slowdown  
were to occur, the CSA's vulnerability would be  
limited to the capital expenditures for the devel-  
opment or subdivision in progress.

#### COMMENTS ON ASSUMPTIONS ABOUT TIMING

##### Background

The development of Las Positas is assumed in this anal-  
ysis to occur over a 20-year period. As stated in the  
RDEIR, the actual development schedule will be subject to  
business cycles and other conditions that will affect  
economic growth, population growth and construction  
feasibility.

The question of an appropriate hypothetical development  
schedule for fiscal impact analysis presents itself in  
this context. In the early analysis submitted by Wilsey  
& Ham, it was assumed that development would occur evenly

throughout the 20-year period. This assumption is con-  
servative in that it minimizes the maximum potential  
differences between assumed and actual development rates.

The current analysis is less conservative in that it P.10.12  
varies the amount of development by phase and by year  
within each phase. This set of timing assumptions would  
not necessarily constitute a serious error except that  
the analysis does not link capital improvement costs to  
the timing of new development. It therefore shows costs  
where they would not be incurred - or, more specifically,  
incurs greater costs than would be warranted for the  
development schedule shown - and consequently distorts  
the cash flow and fund balance projections.

##### Specific Comments

Page 5-151 (Schools): The LVUSD wants schools to be P.10.13  
provided during the first several years of the  
project to avoid impacts on the existing schools.  
Schools constructed at that time, however, would be  
severely underutilized. A more cost-effective  
approach to providing school facilities while  
avoiding adverse impacts would be to provide porta-  
ble classrooms, which can be rented from the State  
at low cost, and defer school construction until  
greater numbers of students are present.



Page 5-155 (Table 5.41, Public Land Acquisition Costs and *P.10.14*

Revenues): The conservative default assumption would be that land fees are collected in even increments. This table shows them in uneven increments because the analysis arbitrarily assumes that commercial development occurs only in years two and four of each phase. Evening out the revenue stream does not change the net condition of the fund: annual deficit and gain amounts are altered, but the cumulative fund balance is still always positive.

Page 5-156 (Table 5.42, Capital Improvement Fund): The *P.10.15*

RDEIR incorporates arbitrary assumptions about the timing of development costs and revenues that appear to be inconsistent with each other. Table 5.42a, which shows equal annual road costs, park costs and development fee revenues within phases, shows negative fund balances (cumulative) in only six years instead of seven, with significantly lower deficits. Table 5.42b shows the fund balances under the same assumptions as Table 5.42a with one additional condition: that positive fund balances accrue interest of 5.25 percent per year and negative fund balances incur costs of 5.25 percent per year. Although the 5.25 percent interest rate is unrealistically conservative, it does illustrate the effect of investing positive balances and borrowing to cover negative ones. The table shows a net gain of \$6,175,000 over the 20-year period over Tables 5.42 and 5.42a (\$6,000 in additional payback of the

TABLE 5.42A

Las Positas Capital Improvement Fund  
Sensitivity Analysis: Even Accrual of Development Fees, Parks Costs and Road Costs

Year	CSA	Roads	Pub. Bldgs.	Schools	Parks	Total Costs	Spons. Advance	Development DU's	Feet Dues	Total Revenue	Spons. Advance Payback	Balance Annual	Cum.
Pre-Dev.	10,798	1,188	195	0	0	12,181	12,181	0	0	12,181		0	0
1	0	0	0	0	0	0	0	7,294	982	8,275		8,275	8,275
2	8,691	1,809	200	0	313	11,013	0	7,294	982	8,275		-2,738	5,537
3	1,121	1,809	0	19,975	312	23,217	0	7,294	982	8,275		-14,942	-9,404
4	1,121	1,809	0	2,805	313	6,048	0	7,294	982	8,275		2,227	-7,177
5	1,121	1,809	0	0	312	3,242	0	7,294	982	8,275		5,033	-2,144
	12,054	7,236	200	22,780	1,250	43,520	0	36,468	4,908	41,376	0	-2,144	
6	1,136	2,278	2,300	0	815	6,528.6	0	7,294	1,283	8,577		2,048	-96
7	1,136	2,278	0	0	815	4,228.6	0	7,294	1,283	8,577		4,348	4,252
8	8,865	2,278	0	2,805	815	14,762.6	0	7,294	1,283	8,577		-6,186	-1,933
9	1,136	2,278	0	2,805	815	7,033.6	0	7,294	1,283	8,577		1,543	-390
10	1,136	2,278	0	0	815	4,228.6	0	7,294	1,283	8,577		4,348	3,958
	13,409	11,390	2,300	5,610	4,073	36,782	0	36,468	6,415	42,884	0	3,958	
11	839	1,545	1,465	0	250	4,099	0	7,294	1,789	9,082		4,983	8,941
12	839	1,545	0	0	250	2,634	0	7,294	1,789	9,082		6,448	15,390
13	9,883	1,545	0	9,180	250	20,858	0	7,294	1,789	9,082		-11,776	3,614
14	839	1,545	0	2,805	250	5,439	0	7,294	1,789	9,082		3,643	7,258
15	839	1,545	0	0	250	2,634	0	7,294	1,789	9,082		6,448	13,706
	13,239	7,725	1,465	11,985	1,250	35,664	0	36,468	8,044	45,412	0	13,706	

sponsor's advance and \$6,169,000 in net gain). With a more realistic, higher interest rate, this gain would be greater.

#### COMMENTS ON ASSUMPTIONS ABOUT LEVELS OF COSTS AND REVENUES

##### Background

Several of the assumptions used and statements made in the analysis appear to be questionable. Questions arise either because of the comparability issue raised in the first section of these comments or because underlying assumptions are not adequately explained.

##### Specific Comments

Page 5-162 (Adjustments to the Proposed Financing Program): If the payback provision were eliminated, *P.10.16* the per unit cost of the land and development fees would be reduced by about six percent, or \$500.

Page 5-172 (General Fund): The analysis of health service costs in paragraph four fails to indicate why average health costs for Las Positas residents will be even half the average countywide per capita amount. Households with incomes sufficient to buy new houses are likely to prefer - and be able to afford - private medical care. *P.10.17*

This assumption, combined with the attribution of *P.10.17* increased net costs for health service to new residents of the county, has significant impacts on the fiscal impact analysis. For example, under the assumptions currently used, the general fund would experience negative cash flows through 2001-02 (with the exception of 1999-2000) and would experience negative cumulative impacts throughout the 20-year period, as shown in Table 5.48 (page 5-176). If the health cost assumed were only 20 percent lower, at \$20, the annual cash flows would turn positive in 1992-93 (except for one later year, 1996-97) and the cumulative fund balance would turn positive by 1999-2000. This result is presented in attached Table 5.48a. Table 5.48b, also attached, summarizes the projected cash flow if health costs equal 70 percent of the current assumption, or \$17.50 per capita. In that case, annual cash flows would turn positive by 1989-90 and the cumulative impact on the general fund would turn positive by 1997-98.

Page 5-173 (Table 5.47): It is not clear why the revenue *P.10.18* from property transfer taxes varies so widely from year to year. It is also unclear why revenue from cigarette taxes declines after 1999-2000.

Page 5-174 (General Fund): There is no indication that *P.10.19* property tax projections recognize reassessment upon sale of property nor, if they do, by how much.



able 5.48A

S POSITAS

AMEDA COUNTY GENERAL FUND ANALYSIS: COSTS AND BALANCE

Health Costs @ \$20.00 Per Capita

YR	COSTS				REVENUE		BALANCE	
	GENERAL GOV'T	HEALTH NET	SOCIAL SERVICES	SHERIFF PATROL	TOTAL	TOTAL	ANNUAL	CUM.
85/1986	331000	46560	13100	126600	517260	261800	-255460	-255460
86/1987	661700	93120	26100	253000	1033920	807900	-226020	-481480
87/1988	993200	139760	39200	379800	1551960	1469300	-82660	-564140
88/1989	1323800	186240	52200	506200	2068440	2002100	-66340	-630480
89/1990	1654900	232800	65300	632800	2585800	2628700	42900	-587580
BTOTAL	4964600	698480	195900	1898400	7757380	7169800	-587580	
90/1991	1981400	278800	78200	757700	3096100	3078800	-17300	-604880
91/1992	2308900	324800	91100	882900	3607700	3567700	-40000	-644880
92/1993	2635200	370800	104000	1007700	4117700	4186900	69200	-575680
93/1994	2862700	416800	116900	1132900	4629300	4652300	22920	-552760
94/1995	3211200	462800	129800	1257700	5139500	5253300	113800	-438960
BTOTAL	13177400	1854680	520000	5038900	20590380	20739000	148620	
95/1996	3608600	507760	142400	1379900	5638660	5641700	3040	-435920
96/1997	3928600	552800	155000	1502200	6138600	6115400	-23200	-459120
97/1998	4248000	597680	167600	1624400	6637680	6775800	138120	-321000
98/1999	4568400	642800	180300	1746900	7138400	7232800	94400	-226600
99/2000	4887500	687680	192900	1868900	7636980	7878700	241720	15120
BTOTAL	21241100	2988720	838200	8122300	33190320	33644400	454080	
00/2001	5200400	731680	205200	1988600	8125980	8234200	108320	123440
01/2002	5512900	775680	217600	2108000	8614180	8711200	97020	220460
02/2003	5825700	819680	229900	2227700	9102980	9529500	426520	646980
03/2004	6138600	863680	242300	2347300	9591880	9995600	403720	1050700
04/2005	6451500	907680	254600	2467000	10080780	10794200	713420	1764120
BTOTAL	29129100	4098400	1149600	11138600	45515700	47264700	1749000	



able 5.48B

E POSITAS

AMEDA COUNTY GENERAL FUND ANALYSIS: COSTS AND BALANCE

Health Costs @ \$17.50 Per Capita

AR	COSTS				REVENUE		BALANCE	
	GENERAL GOV'T NET	HEALTH COST	SOCIAL SERVICES	SHERIFF PATROL	TOTAL	TOTAL	ANNUAL	CUM.
85/1986	331000	40740	13100	126600	511440	261800	-249640	-249640
86/1987	661700	81460	26100	253000	1022260	807900	-214380	-464020
87/1988	993200	122290	39200	379800	1534490	1469300	-65190	-529210
88/1989	1323800	162960	52200	506200	2045160	2002100	-43060	-572270
89/1990	1654900	203700	65300	632800	2556700	2628700	72000	-500270
BTOTAL	4964600	611170	195900	1898400	7670070	7169800	-500270	
90/1991	1981400	243950	78200	757700	3061250	3078800	17550	-482720
91/1992	2308900	264200	91100	882900	3567100	3567700	600	-482120
92/1993	2635200	324450	104000	1007700	4071350	4186900	115550	-366570
93/1994	2962700	364700	116900	1132900	4577200	4652300	75000	-291540
94/1995	3289200	404950	129200	1257700	5081650	5253300	171650	-119690
BTOTAL	13177400	1622320	520000	5039900	20358620	20739000	380380	
95/1996	3608600	444290	142400	1379900	5575190	5641700	66510	-53380
96/1997	3928600	483700	155000	1502200	6069500	6115400	45900	-7480
97/1998	4248000	522970	167600	1624400	6562970	6775800	212830	205350
98/1999	4568400	562450	180300	1746900	7058050	7232800	174750	380100
99/2000	4887500	601720	192900	1868900	7551020	7878700	327680	707780
BTOTAL	21241100	2615130	838200	8122300	32816730	33644400	827670	
00/2001	5200400	640220	205200	1988600	8034420	8234200	199780	907560
01/2002	5512900	678720	217600	2108000	8517220	8711200	193980	1101540
02/2003	5825700	717220	229900	2227700	9000520	9529500	528980	1630520
03/2004	6138600	755720	242300	2347300	9483920	9995600	511680	2142200
04/2005	6451500	794220	254600	2467000	9967320	10794200	826880	2969080
BTOTAL	29129100	3586100	1149600	11138600	45003400	47264700	2261300	



Gruen Gruen + Associates

Page 5-180 (Fund Balances): Note that these conclusions would be significantly different given alternative assumptions about health costs, as much of the deficit shown in the early years is attributable to the general fund.

#### COMMENTS ON THE INCLUSION OF OTHER-THAN-FISCAL IMPACTS

##### Background

The definition of fiscal impacts is "the effect of actions, plans or policies on the public treasury"; that is, the public fisc. The analysis therefore focuses on public rather than private costs and revenues. In this analysis, other types of impacts - primarily private market economic impacts - have been introduced. In some cases, in addition to confusing the fiscal analysis, they misstate some of the economic impacts.

##### Specific Comments

Page 5-158 (Table 5.43): The table appears not to recognize all the elements of the financing program. For example, while developers would pay back the sponsor's advance as part of the development fees, they would have an interest-free loan on that money and would in turn pass it forward to home purchasers. In fact, all fees would be passed forward. This situation in which funding of capital facilities is provided by private rather than public sources, is an impact of Proposition 13. P.10.20

The table also states that projected cash flow deficits in the Public Land Acquisition Fund and the Capital Improvements Fund could require revenue from other public agencies. In fact, there are no deficits projected in the Public Land Acquisition Fund, and deficits in the capital improvements fund are limited to one year's duration. P.10.21

Page 5-159 (Financial Burden): In paragraph one, the statement that development costs and sales prices are "relatively fixed" contradicts the earlier statement that costs will rise and reduce feasibility.

The statement in paragraph two about developer/builder profits in weak market situations is irrelevant to a fiscal analysis.

Page 5-198 (Table 5.60): The impacts on future residents and businesses result from Proposition 13 rather than from this project.

#### FINAL COMMENTS

There are two statements that appear to be inaccurate.

Page 5-154 (Public Land Acquisition Fund): The RDEIR refers to deficits in the fund. No deficits are shown.



Page 5-171 (Mitigation Measures): The first identified P.10.22  
impact, potential fund balance deficits, is not sub-  
stantiated by the preceding analysis.



# Livermore Area RECREATION and PARK DISTRICT

71 TREVARNO ROAD, LIVERMORE, CALIFORNIA 94550

Phone: (415) 447-7300

GENERAL MANAGER

WILLIAM J. PAYNE

May 13, 1983

BOARD OF DIRECTORS

ALAN H. SARKIS  
MARRY FREYTES  
JOAN TOTT  
MARLIN A. BOND  
ERINIE RODRIGUES

11:27

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

Attention: Bill Allin

Dear Mr. Allin:

REFERENCE: REVISED DEIR: LAS POSITAS GENERAL PLAN AMENDMENT  
LARP DISTRICT LETTER DATED AUGUST 3, 1982

The Livermore Area Recreation and Park District (LARP) Board of Directors completed their review of the subject DEIR during the regular Board meeting held on May 11, 1983. The following comments and recommendations are as a result of that review and are designed to raise specific points the Board feels should be addressed by the project sponsor before approval for the project is granted.

The Board concurs with the general concept proposed by the sponsor to provide park and recreation services for the Las Positas development with LARP being the agency to provide those services. The entire project area is located within the legal boundaries of the District and therefore is within the jurisdiction of the LARP. Therefore, the LARP is the logical agency to provide the required park and recreation services.

The District now serves approximately 55,000 persons, including those currently residing within the project area. It has provided these services for 35 years. The District is capable of expanding services so as to provide for the park and recreation needs of 45,000 persons projected to reside in Las Positas.

The Board does not concur with the proposal that the County Service Area (CSA) have a long-term capability of providing park and recreation services and strongly recommends the project sponsor be required to delete this provision from the proposal. The LARP is a special purpose district organized under the provisions of Division 5, Chapter 4 (Recreation and Park Districts) Public Resources Code, State of California specifically to provide park and recreation services for persons residing within its legal jurisdiction. As brought out above, the proposed development lies entirely within the District's boundaries and the District is capable of expanding services so as to provide for the needs of the Las Positas residents. Duplication of the capability for two separate agencies to provide park and recreation services in the project area even of a long term nature, would result in needless expense to the local taxpayers and would be counter-productive.

Alameda County Planning Department

May 13, 1983

Page 2

The Board still concurs with the project sponsor's proposal to provide 18 neighborhood parks and 2 community parks totalling some 230 acres, and all improved to LARP standards and turned over to the District for operation and maintenance once they have been developed by the project proponents.

The Board does not concur with the proposal that so called "surplus property tax revenues" be directed or used to reduce certain developer costs or user fees, if it is the intent that this requirement pertain to property tax revenues from tax code area 64001 for LARP. Expenditures of property tax revenues are solely the responsibility of the legislative body of each public agency for which such taxes are collected; no outside agency has authority to dictate or determine how or when such funds will be expended. More directly, the expenditure of property tax revenues collected in tax code area 64001 for park and recreation service is the sole responsibility of the LARP elected Board of Directors. Recommend that the project sponsor be required to revise his proposal to reflect this fact.

The District does collect user fees for program purposes and these monies are used to offset some of the costs for program activities. Such fees are not used for park maintenance purposes. The statement in the DEIR that LARP provided the \$1.00 per capita estimate is not correct. By eliminating the \$1.00 per capita user fee from the revenue projection (table 5.57) there would be a revenue reduction of some \$205,200 over the 20 year build-out period. Recommend that the project sponsor be required to revise the revenue projections so as to bring them into line with current District practices concerning user fees.

The LARP provides both regional and community type recreational opportunities. The project area lies entirely within the jurisdictional boundaries of the LARP and outside such boundaries of the East Bay Regional Park District (EBRPD). Therefore, except for Del Valle State Recreation Area, the EBRPD has no authority to operate in areas serviced by the LARP. The LARP will exercise its responsibilities of providing regional type recreational opportunities for residents of the project area.

There is no doubt that Las Positas will have some impact on the use of Del Valle State Recreation Area just as any new development would; just as growth in the Pleasanton/Dublin San Ramon areas (EBRPD boundaries) is now having on LARP. A regional type facility, by its very nature, will draw users from a wide area. Del Valle, as a State owned facility, draws users from a much wider area than the boundaries of EBRPD.

Del Valle State Recreation Area and reservoir is a part of the State Water System. Legislative action establishing the system included a requirement that the State provide for recreational opportunities at certain locations, including Del Valle. EBRPD contracted with the State for the responsibility of operating the recreational portion of the Del Valle site thereby relieving the State of that requirement. The State has provided most of the funds for capital improvements of a recreational nature while EBRPD provides the operating funds. Any responsibility that the owners of property located within EBRPD boundaries have toward funding operations of Del Valle has been based upon voluntary action and commitments made by the EBRPD Board of Directors.

The residents of Alameda County not located within the EBRPD boundaries do not have that burden or obligation because LARP recognized while Del Valle was still in

the planning stages, that the State was obligated by law to provide recreational opportunities for the site without an investment of local property tax dollars. LARPD also recognized that operation of the facility by a local public agency would be on a deficit basis for a number of years, thereby requiring local tax payers to subsidize the operation of a State owned facility. LARPD strongly believes it is a State responsibility to provide funds needed for Del Valle rather than local property owners.

The Board does not agree with the total revenue projections that reflect a \$13,080,000 "surplus" over the term of the project for several reasons, one of which was discussed above under user fees. Other reasons are as follows:

Under current law, and practice, about 50% of the District's share of the 13.28% property tax levy goes into the Special District Augmentation Fund (SDAF) for allocation as deemed appropriate by the Board of Supervisors.

The study assumes that LARPD will receive 100% of LARPD's 13.28% share of property tax revenues derived from tax code area 64001. This is not factual. Actual experience over the last few years reveals that LARPD eventually receives about 90% of the full 13.28% share resulting in a short-fall of around 10% each year. This 10% annual short-fall translates into a reduction of some \$1,100,000 in total revenue over the 20 year life of the project. The Board of Supervisors has sole discretionary responsibility on how funds in the SDAF will be allocated to special districts in the county area. There is no assurance that the same percentages will be allocated in future years as they have been in the past.

The study addresses only park maintenance costs. Not factored into the operation and maintenance costs are the monies needed to operate and maintain the facilities and public buildings which will be required (recreation centers, tennis courts, swimming pools, ball fields, etc.).

Also omitted are monies for personnel staffing, administrative costs, equipment needs, supplies, and the monies needed to provide program activities for the estimated 45,000 residents.

The Board strongly recommends that the project sponsor be required to address the revenue and cost projections as they relate to the provision of park and recreation services so as to reflect all facets of providing park and recreation services for the project area, not just park maintenance costs.

The Board feels that the areas discussed above should be addressed by the project sponsor before General Plan amendments are made and approval to proceed is granted. LARPD staff is available to answer questions or to work with the project sponsor and/or County staff on the matter.

Sincerely,

*Ernie Rodriguez*  
ERNIE RODRIGUES, Chairman  
Board of Directors

## SHERIFF'S DEPARTMENT • COUNTY OF ALAMEDA

GLENN DYER  
SHERIFF



COURTHOUSE  
1225 FALLON STREET  
OAKLAND, CALIFORNIA 94612

(415) 874-5757

May 13, 1983

Betty Croly, Assistant Planning Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

Subject: LAS POSITAS ENVIRONMENTAL IMPACT REPORT ADDENDUM  
(Section 5.5 Public Services; Police Protection)

Recognizing the impending hearing on May 16, 1983 concerning the Las Positas Project, it is critical that several addendums be included in the "Police Protection" area, as follows:

1. Police Services Support Staff: It is estimated that the badge personnel complement requires a 30% support staff.<sup>1</sup> Given 88 badge positions then a support staff of 27 would be appropriate. It is not possible, at this time, to develop the actual configuration but the following position designations are deemed appropriate: records supervisor, dispatch supervisor, records clerk, warrant clerk, data input clerk, dispatcher, etc. G.1.1
2. County-Wide Criminal Justice Services: There are two county-wide criminal justice services that are impacted by Las Positas. They are: G.1.2
  - (a) Alameda County Crime Laboratory: The Crime Laboratory provides services to law enforcement in the area of criminal evidence analysis. Las Positas is anticipated to require an additional Criminalist and supporting analytical equipment.<sup>2</sup> In addition, due to its distance from the central facility an additional vehicle, vehicle equipment, and office space will be required.
  - (b) Central Identification Bureau: This bureau provides mandated fingerprint support services, in addition to #1 above, for all Alameda County law enforcement agencies. Las Positas' impact will mandate two additional personnel, they are a latent fingerprint Specialist and a fingerprint Technician.<sup>3</sup>

Please advise if additional information will be required.

GLENN DYER, SHERIFF

By: *Keith Bryan* Capt for:  
R.F. Souza, Chief  
Criminal Division

RFS:TPR:KEB:bb

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MAY 16 AM 11:27  
ALAMEDA COUNTY PLANNING  
DEPARTMENT



Alameda, Contra Costa and Solano Counties

1030 Shary Court, Suite B  
Concord CA 94518  
Telephone 415/676-3272

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1983 MAY 13 AM 11:24

ALAMEDA COUNTY PLANNING COMMISSION  
MAY 13 1983



Alameda County Planning Commission  
May 11, 1983  
Page 2

disparity of 17,000 units for the County as a whole and a disparity of 4,610 for the unincorporated area.

We believe this disparity is a significant one and one which is likely to increase beyond 1985, as Hacienda Park and Bishop Ranch develop and job growth increases dramatically.

Las Positas can be a significant help in beginning to narrow this gap between supply and demand. We urge you to approve the project.

cc: Alameda County Board of Supervisors

May 12, 1983

To: Alameda County Planning Commission

From: COLAB, by Linda Best, Executive Secretary *LB*

Re: Las Positas

The Coalition of Labor and Business, representing labor and business interests in Alameda, Contra Costa and Solano Counties, has followed the Las Positas project for some years and has supported the project as providing needed housing for the area.

As you consider Las Positas now, we believe this factor assumes even more importance than it did in 1977. The problem, in terms of both supply and affordability, has increased dramatically.

Last year COLAB commissioned a study by Menkin/D.S./Lucero and Associates to project housing demand for Alameda and Contra Costa Counties through 1990, with special emphasis on 1980-85. The intent was to insure that projections adopted by ABAG, pursuant to the requirements of AB 2853, would be as accurate as possible and based on current census data. These ABAG numbers are incorporated into General Plans and are frequently used to size infrastructure. We believe that the COLAB report has significance for your deliberations.

The report projects a demand for new housing in Alameda County of 41,000 units through 1985. Of that amount, 7,900 are projected for the unincorporated area. The Alameda County Board of Supervisors, in their action on the numbers, determined that 7,900 was conservative considering the activity in the area and adopted a range with 4,991 as the low and 10,000 as the high.

What may be of even greater significance is the disparity between this demand and the estimated increase in housing supply through 1985. Based on surveys of local jurisdictions, the report projects a

Member Organizations

Aggregates and Concrete Association  
East Bay

Alameda County Building and  
Construction Trades Council

Associated General Contractors of  
California - East Bay District

Building Industry Association of  
Northern California

Carpenters Local No. 1622

Carpenters Local No. 180

Contra Costa Board of Realtors

Contra Costa County Building and  
Construction Trades Council

Contra Costa County Central  
Labor Council

Contra Costa County Development  
Association

Council of Richmond Industries

Hayward Chamber of Commerce

IBEW No. 302

IBEW No. 595

IREW No. 1245

IWW

Lathers Local No. 88

Plumbing and Plastering Institute  
of Northern California

Napa/Solano Counties Building Trades  
Council

Oakland Chamber of Commerce

Operating Engineers Local No. 3

Pacific Gas and Electric

Plumbers and Gas Fitters Local No. 444

Plumbers and Steamfitters Local No. 159

Port of Oakland

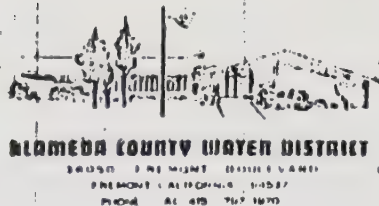
Steamfitters Local No. 142

Underground Contractors Association

(Partial List)

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**DIRECTORS**  
**FRANK BORCHI, JR.**  
*President*  
**HARRY D. BRUMBAUGH**  
**JOSEPH G. DAMAS, JR.**  
**CLARK W. REDEKER**  
**CARL H. STRÄNDBERG**



**OFFICERS**  
**ROY E. COVERDALE**  
*General Manager*  
**RUTH R. EVANS**  
*District Secretary*

May 12, 1983

Alameda County Planning Department  
 399 Elmhurst Street  
 Hayward, CA 94544

Attention: Mr. William H. Fraley, Planning Director

COMMENTS ON REVISED DRAFT ENVIRONMENTAL IMPACT REPORT ON LOS POSITAS, GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS

The Alameda County Water District is concerned with the wastewater system and the groundwater effects of the proposed project. The measures in the report for allaying these concerns appear on paper to be adequate; however, we are fearful that the future reality with the large expenses involved will be a different matter. J.6.1

Thank you for the opportunity to comment on the proposed development.

*Roy E. Coverdale*  
 ROY E. COVERDALE  
 General Manager

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 ALAMEDA COUNTY PLANNING  
 DEPARTMENT

## Building and Construction Trades Council OF ALAMEDA COUNTY

*Affiliated with the California Labor Federation and the Building and Construction Trades Department  
 AFL-CIO*

2015 VALDEZ STREET • OAKLAND, CALIFORNIA 94612 • Phone 893-5788

May 12, 1983

Alameda County Planning Commission  
 399 Elmhurst  
 Hayward, California 94544

Dear Commissioners:

Monday, May 16, your Commission will hold another hearing regarding Los Positas General Plan Amendments and Rezoning Considerations.

Our Council again respectfully asks you to approve all aspects of this project for the same reasons: to fulfill the demand and need for housing, ease unemployment in Alameda County and stimulate the Building Trades economic future.

We still feel that it is a well-planned, well-thought-out new town concept offering local jobs, local tax incentives, reasonably priced land with minimal, if any, increased air pollution.

Los Positas holds a great long-term promise for our County. Your approval could assure that.

Sincerely,

*William Ward*  
 William Ward  
 Business Representative  
 Secretary-Treasurer

When  
 open-29-afl-cio

1983 MAY 13 PM 4:00  
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May 11, 1983  
Page 2

May 11, 1983

Mr. Griffeth Tully, Chairman  
Planning Commission  
County of Alameda  
399 Elmhurst, Room 104  
Hayward, CA 94544

Re: Comments on Las Positas Revised Draft EIR

Dear Chairman Tully and Members of the Planning Commission:

I am writing this letter on behalf of Orr Property Venture, a partnership, which owns assessors parcels 99-5-3-1 and 99-5-3-2 in the southwesterly corner of the Las Positas planning area. Our support for the General Plan Amendment and Rezoning consideration has been communicated to the Planning Commission by my letters of October 18 and November 8, 1982. However, we wish to make the following specific comments on the Revised Draft EIR:

#### PUBLIC LANDS ACQUISITION FUND AND CAPITAL IMPROVEMENTS FUND

On page 2-13 of the Summary there is a statement that the Public Land Acquisition Fund fee may be exacted at the time of property subdivision or land sale. The new Financial Analysis section by McDonald and Associates appears to assume that the fee will be exacted only at the time of property subdivision. Which is correct?

We prefer that this fee be exacted only upon subdivision of property, not at time of sale. As noted elsewhere in the McDonald analysis, the present land owners are already going to suffer reductions in land values because developers buying properties will discount their offers to reflect the Capital Improvements Fund fees they will have to pay upon subdivision of the land they buy. We hope you will agree that present property owners should not be further penalized, if they want to sell their property now to others for eventual resale, by the imposition of this fee at the time of such sale.

On page 5-154, beginning on the fourth line, the assumption is made that the Sponsor's Advance is to be repaid, with market rate interest. However, elsewhere in the Financial Analysis there are

mentions that negative fund balances (in the Capital Improvements and other funds) may result from the proposed financing plan, during some years and possibly cumulatively. It is our position that a Mitigation Measure should be specifically prepared by the County and adopted to ensure that the Sponsor, not the other present property owners and/or subsequent residents, fund any yearly or cumulative shortfalls in the fund balances of the CSA, County or other affected agencies. This kind of measure should assuredly be adopted if the Sponsor is to be eventually repaid, with interest.

On page 5-161, the last summarized impact, there is an allusion to the possible legal conflict with the land purchase fee arrangement, vis-a-vis Proposition 13. Is this legal question to be adjudicated? Prior to project approval? It is our view that the Sponsor, not the County, should underwrite the expense of resolving this question.

#### ALTERNATIVE LAND USE DIAGRAM

The Alternative Land Use Diagram shown in Figure 5.18 is preferred by us, and we recommend that the Commission consider a modification of this proposal in lieu of the previous diagram shown on Figure 2.1. It is our opinion that this proposal is more responsive to present ownership patterns and represents a more logical and thoughtful response to land planning and circulation needs for this master planned community.

However, we are concerned that approximately 1/2 of our 140 acre parcel is taken up by brine evaporation pond, park, open space, and industrial land. Large quantities of industrial land are ready for development at the present time in Alameda County. According to ARAG and other agencies, the important public need in the County is for housing, not for additional industrial land. Accordingly, we request that the designated industrial land area on our parcel be reduced substantially and that the ER2 area be enlarged. An industrial parcel of the size shown immediately to the north of our property is ample for the project and would improve the alternative land use plan in that the proposed middle school would not then abut on an industrial area on two sides.

We would also request that a proposed phasing plan be prepared for the alternative land use plan, as was done for the previous plan diagram, in order for all present property owners to see the phasing consequences of the land use diagram revisions.



May 11, 1983  
Page 3

#### OTHER CONSIDERATIONS

It is our view that the Commission should maintain the previously proposed basic financing methods for funding public lands acquisition and capital improvements. The creation of such funds from the Sponsor's advance and developer fees will assure that needed improvements are indeed undertaken. Consideration of the use of assessment districts for initial construction is quite speculative, in the public financing, though theoretically less expensive due to tax exempt provisions, would in reality be extremely difficult to implement, given the need for resident voter approval, the speculative nature of the proposal, and the unlikelihood that future residents would continually vote for the high level of improvements needed to make the community a success. <sup>P. 8.4</sup>

Using the previously proposed financing methods, with the modifications we suggest, will assure that necessary public improvements will be provided when needed, that present property owners will not be unduly penalized for happening to own property which is being planned without their complete satisfaction, and that the entire undertaking will have a much greater potential for complete and timely development.

#### CONCLUSIONS

We recommend that the Planning Commission move forward with the approval of the Las Positas General Plan Amendment and Rezoning, taking into account the above mentioned considerations.

We look forward to your consideration and approval of what can be a positive response to the pressures for needed development of housing, commerce and industrial employment opportunities in Alameda County.

Sincerely,

*R. H. Martinson*

Riho H. Martinson

for  
Orr Property Venture

May 11, 1983

Alameda County Planning Commission  
399 Elmhurst Street  
Hayward, California 94544

Members of the Commission;

We are property owners in the Las Positas "New Town" area and we <sup>P. 9.1</sup> strongly oppose the formation of assessment districts to finance land acquisition and capital improvements for the Las Positas Land Co. project. If individuals wish to do this on their own and involve their land only that is their prerogative.

We know that eventually the Las Positas area will be developed. This project has been in the making for over ten years, that is a long time to be hanging in "limbo". We urge you to make a decision soon so we can get on with our lives. We don't believe people have stopped to consider the insecurity all of this has imposed on us. All they talk about is the money that is to be made. We have a lot invested so why shouldn't we be able to get it back with a margin of profit, an others who sell do.

We are tired of being called speculators, being pulled in different directions and fought over. Just balancing between relocating or staying has caused a lot of problems, such as, do we improve or do we wait to see what happens. "Limbo" isn't exactly one of our favorite places, so we again urge you to make a decision soon on the Las Positas project.

Sincerely,

*Leland E. Stanley*  
Leland E. Stanley

*Mary Elise Stanley*  
Mary Elise Stanley

4210 R. 1-1000 Hwy. 100

Hayward, California

RECEIVED  
1983 MAY 13 AM 11:03  
ALAMEDA COUNTY PLANNING COMMISSION  
HAYWARD, CALIF.

Public Works Building, Room 233, 399 Elmhurst Street, Hayward, CA (415) 881 6190

DATE: MAY 11, 1983

TO: WILLIAM H. FRALEY, PLANNING DIRECTOR

FROM: ROLAND MAYNE, EXECUTIVE OFFICER

SUBJECT: DRAFT EIR, LAS POSITAS GENERAL PLAN AMENDMENT

Comments on the General Plan Amendment Environmental Impact Report (a revision of the June 1982 DEIR) are as follows:

1. Although certain statements of objectives as listed on Page 5.126 of the original EIR have been deleted, the objective of the proposal remain the same; e.g., one that the ultimate control of the development lies with the County. There has not been a review of the impact of this objective. The present governmental structure within the State provides that cities are much better equipped to provide urban services and urban control in urban areas than counties. No place does the report deal with the problem of the County becoming involved in the provision of urban services instead of requiring that they be provided by a municipality. *O.2.1*
2. The proposal puts the County in the position of being the "developer" for the project. Although the financial information indicates that the County should be reimbursed for this service, there are certain philosophical as well as procedural questions that should be resolved. The County in its role of "developer" will be required to satisfy the needs of 51 property owners who wish to develop their property at varying rates and also to assure that the project proceeds at a pace sufficient to cover the various developmental costs. The dual role for the project may put the County in a position of having a conflict between its functions of controlling and assuring adequate development and its necessity to promote the development to raise the money to keep the project solvent. *O.2.2*
3. On Page 5-154 of the report it is stated "For the analysis, it was also assumed that market rate interest would be paid on the advance." However, on Page 5-155 and 5-156, Tables 5.41 and 5.42, there are no funds included in either of these charts for payment of interest for the sponsors advance. Interest for 20 years on \$14 million dollars is a sum that would exceed the original sponsors advance. *P.14.1*
4. The report indicates that fire protection would be provided through the Structural Fire Fund. The Structural Fire Fund was established to provide a level of service for rural fire protection. There was no intent that the Structural Fire Fund would be used to provide an urban area service. All calculations and information on the provision of fire services should be included as a part of the CSA rather than the other County funds. The report should include the impact of a potential County provision of urban services to this area would be chargeable against the CSA. This would possibly at a minimum include police services and animal control. *P.14.2*  
*O.2.3*

5. CEQA requires that EIR's should include options or alternatives to the proposed project. This report touches very lightly on the most viable option-development within the City of Livermore, Page 7-12.

Since this project is a development that could be coterminous with the City of Livermore, there should be a separate and specific alternate reviewed that would provide for an orderly extension of the infrastructure of the City of Livermore to provide services for the development. This could be easily accomplished by different phases of the project. The report does not deal with the impacts of the intervening land north of Livermore and south of the project.

A study of this alternate would give the extra costs of sprawl by determining the duplicate costs providing services in a new area as proposed to orderly addition to the infrastructure and services of the existing city. No where in the report does it cover the impact on the LAFCO Guidelines relative to Spheres of Influence which state that the first priority for development is for the annexation of territory to an existing city or district and the last priority is the formation of a separate special district.

These comments are supplemental to those made in letter dated August 4, 1982.

If you wish to further discuss any of these or other comments, please contact me.

RM:cd

cc: Commission members  
County Counsel  
County Administrator



BOARD OF SUPERVISORS

SHEET 220  
PLAZA PROFESSIONAL BUILDING  
EL CERRITO, CA 94530

TELEPHONE (415) 826-1204

FRED F. COOPER  
SUPERVISOR, THIRD DISTRICT

May 10, 1983

William Fraley  
Planning Director  
136 - Public Works Building

re: Las Positas

Dear Bill:

I enclose a copy of Appendix B from the original EIR on Las Positas which shows 24,000 jobs in Livermore, 65,000 in Pleasanton, 1,400 in Dublin, and 28,000 in San Ramon.

My impression has been that one of the justifications for Las Positas is to provide housing for people who will be holding these jobs as industry comes into the Valley. My impression is that the current EIR does not clearly indicate the need for housing in Las Positas for the workers in these proposed jobs.

I would appreciate your letting me know whether my impression is correct or incorrect, and giving me copies of specific quotes from the current Las Positas EIR on this question.

Thanks a lot.

Yours truly,

*Fred*  
Fred F. Cooper

FFC:g  
enclosure  
cc: Bill Leonard

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1983 MAY 12 AM 8:55  
ALAMEDA COUNTY PLANNING  
DEPARTMENT

May 10, 1983

Alameda County Planning Commission  
399 Elmhurst Street  
Hayward, CA 94544

Re: Las Positas General Plan Amendment

Dear Commissioners:

I am the owner of one of the parcels that will be in the Las Positas Development and urge you to consider accepting the Las Positas project. The 110 acre parcel that I own has very little use as agricultural land. I now lease it and receive \$13.00 per year per acre, as only hay can be grown on the land because of the questionable quality of the soil. The taxes on the property are greater than the income.

I obviously have an economic interest in your accepting the Las Positas project, but also strongly feel that the economy in the area with the lack of reasonably priced housing would be helped by the building of Las Positas. I understand the problem of taking farm land out of circulation in the state, but the quality of the land that will be used is so marginal, and its economic impact on farm income is so small that this type of land seems to be the perfect place to build a new town. This project would afford more Bay Area housing, jobs and a good environment for 45,000 people to live.

Sincerely,  
*Morry Leonard*  
MORRY LEONARD

ML:pap

RECEIVED  
1983 MAY 11 AM 9:59  
ALAMEDA COUNTY PLANNING  
DEPARTMENT



Notice to Referral Agencies

May 10, 1981

Subject: Use of Previous Environmental Impact Report  
Current Project: Foley Rezoning, Rezoning and Annexation  
Previous Project: Foley General Plan amendment  
SCH #82102607

The City of Livermore is planning to utilize the E.I.R. prepared for the Foley General Plan amendment for the Foley Rezoning, Rezoning and Annexation.

The applicant has requested approval of I-1 (Low Intensity Industrial) zoning. Also to be considered are other Zoning Districts permitted by the General Plan.

The E.I.R. was submitted to your agency on 1-7-81. Please review your copy to determine if your agency had any additional comments.

The zoning and annexation has been scheduled for the Livermore Planning Commission's consideration at their meeting on July 5, 1981. Additional comments should be submitted in writing prior to June 27, 1981.

Leon R. Horst  
Associate Planner

Distribution List:

Zone 7, ACFC & MCD  
Alameda County Planning Department  
ABAG  
BAAQMD  
Chabot College-Valley Campus  
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Fire  
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Planning Director  
Assistant City Manager

State Clearing House (11 copies)  
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Food & Agriculture  
Applicant - Mr. Foley, c/o K. Fraser  
City of Pleasanton  
City of Dublin

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1981 MAY 13 AM 11:03

ALAMEDA COUNTY LIBRARY



GRANDE COOPER  
COUNTY LIBRARIAN

ALAMEDA COUNTY LIBRARY SYSTEM

3121 SHAW BLVD  
HAYWARD, CALIFORNIA 94541  
(415) 885-1333

DATE: MAY 10, 1981

TO: JEFF CAMPEN, PRINCIPAL ANALYST,  
COUNTY ADMINISTRATOR'S OFFICE

FROM: CHARLOTTE LUNDBERG, DEPUTY COUNTY LIBRARIAN, ADMINISTRATIVE  
SERVICES, COUNTY LIBRARY

SUBJECT: LAS POSITAS DRAFT ENVIRONMENTAL IMPACT REPORT - MARCH, 1983

The County Library has reviewed the draft Environmental Impact Report presented by the County Planning Department. The description of the type and level of library services outlined in the Report meets our specifications and the dollars attached to provide those services are as submitted by the Department in constant 1982 dollars. However, the County Library has questions and concerns to raise with reference to the way in which projected property tax revenue and the capital improvement fund have been treated. Without answers to these questions and concerns, the County Library is unable to endorse the analyses and recommendations presented in the Report as they relate to library services.

PROPERTY TAX REVENUE

P. 6.1

QUESTION: What assumptions have been incorporated into the projected prop. tax figures shown in Library Fund Analysis Table 5-50, Page 5-179?

CONCERN: It appears, based on information contained in the text, that constant 1982 dollars have been used to reflect cost of service figures but that property tax revenue estimates have been calculated with the caveats and assumptions outlined on Page 5-146, and 5-174, respectively. To wit, Page 5-146,

"All cost and revenue estimates are presented in constant February, 1982 purchasing power. However, an allowance has been made in all cases where this 'constant dollar' approach would distort the conclusion. (For example, because of terms of Proposition 13, the property tax revenue dollar would, for any given property, decline in terms of real purchasing power.)"

Then on Page 5-174 in discussing the mathematical model used to calculate assessed property values, the following is stated:

"Annual turnover rates were assumed at 10% (once very ten years) for residential properties and 5% for commercial properties. No turnover was assumed for industrial properties. An inflation rate of 7% was assumed."

Jeff Campen, Principal Analyst  
County Administrator's Office

May 10, 1983  
Page Two

If this is the case, then a basic flaw exists in all the analyses involving cost of service/property tax revenue analysis and all projected fund balances which include property tax revenue are indefensible as in those presented in Table 5.50. P.6.1

QUESTION: What is included in the projected property tax revenue figures shown for the Library fund in Table 5.50? P.6.2

CONCERN: It appears from the text that current secured and unsecured tax revenue have been included as well as Homeowner's Property Tax Relief and Special District Augmentation Funds (see Paragraph 3, Page 5-174 and Paragraph 4, Page 5-178).

If this is the case, the County Library does not feel it is realistic to include HPTRS and Special District Augmentation Funds in projected property tax revenues over the next twenty years. In light of the current political and financial climate in California, there is every reason to believe that within the next five years neither of these sources will be available to local jurisdictions. Further, even if there is no agreement with this point of view, HPTRS, it appears, has been factored to grow using the same set of assumptions imposed on assessed property values, thereby falsely inflating the figure.

Without clarification and answers to the two questions raised here, the County Library's review of these sections of the report leads it to conclude that property tax revenue projections have been optimistically calculated and falsely represented.

#### LIBRARY FACILITY - CAPITAL IMPROVEMENT FUND

QUESTION: In light of the difficulties cited above with property tax revenue projections and subsequent fund balances, how will the required 15,000 square foot library be financed? The estimated cost is correct at 2.3 million in 1982 dollars. P.6.3

CONCERN: The Report suggests (Pages 5-154 through 5-157) that the Capital Improvement Fund will finance most required capital improvements.

"Revenue for the Fund would be derived from a fee levied upon developers at the time building permits were issued . . . fees would be based, insofar as possible, on the average incremental cost of each additional residential unit or its equivalent in commercial/industrial space . . ."

but

"Estimated cumulative fund balances in Table 5.42 indicate that development fees alone may not be adequate, on an annual basis, to finance the capital program."

Additionally, it is hinted at on Page 5-183 that operating fund balances could be transferred to cover other deficits (Capital Improvement Fund?). As has been pointed out earlier, the Library questions projected revenue figures and resulting fund balances.

Jeff Campen, Principal Analyst  
County Administrator's Office

May 10, 1983  
Page Three

Discussions on Pages 5-162 through 5-165 on the advantages of a Special Assessment District and/or Community Facilities District as appropriate methods of financing capital improvements do not reassure the County Library that required funds will be available for library facility construction by 1990.

Without very specific financial structures which will guarantee availability of required funds for a library facility built into the Las Positas Plan Approval from the outset:

- 1) Library services to the community will be inadequate and fragmented;
- 2) an uncompensated burden to provide services will fall most heavily on the City of Livermore;
- 3) the already overutilized library facilities in Dublin and Pleasanton will experience an increased demand as well.

I hope the questions and concerns raised in this response will assist you in preparing a County-wide reaction to the Report. If you have questions or wish to discuss any of the issues raised here, please feel free to contact me at your convenience.

CL:st

cc: William Fraley, Planning Department  
Roland Mayne, LAFCO

May 9, 1993

Alameda County  
Planning Commission  
399 Elmhurst Street  
Hayward, Ca. 94544

Dear Commissioners,

I am writing this letter on behalf of myself and my two brothers who have farmed in the Las Positas Valley for over 30 years. We, like so many other small farmers who cannot make a decent living due to high production and high living costs would like to see the New Town Project approved.

In 1927 our grandparents Germaine and Tom Silva purchased 210 acres located at 2010 Manning Road in the Livermore Valley. For over 50 years our family has farmed this ground. In 1962 my grandmother passed away and left the ranch to my father. My father, myself and my two brothers continued farming the ranch as well as other leased ground until 1971 when he and my mother passed away leaving the ranch to us.

In the years that I have been farming I have seen good years and bad years, but I must tell you most of them have been very poor. I have seen years when we get too much rain and either you can't plant anything or it gets flooded out. I have seen years when we didn't get any rain at all and you wind up selling all your livestock because you can't feed them.

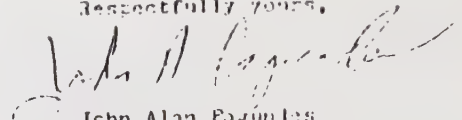
In 1973 there were plans to develop the Las Positas Valley and land prices were high. When they appraised the estate for inheritance taxes it was at these high land prices and there was no exception for Agricultural estates and we were left with enormous estate taxes to pay. Now due to all the opposition to the New Town Project the land prices are back to Agricultural levels. This really doesn't seem fair to me does it to you. Since our family has owned this ranch we have paid inheritance taxes twice, we have paid enormous property taxes all of which has amounted to a lot of money.

The thing that bothers me the most is the opposition to the New Town Project by the city and the people of Livermore. When I see all the growth and development, all the changes

that are going on around me and the town that I grew up in is going backwards instead of forward I get extremely frustrated. The other day my wife went shopping for a pair of shoes for my son and she couldn't find his size. This is just one small example but it goes on all the time. The funny thing about it is that I am always telling her we should shop in Livermore instead of going out of town. Well I guess it's not so funny when you think about it.

In closing I just want to say that the Las Positas Project has as much to do with me as that of my two brothers.

Respectfully yours,

  
John Alan Escobedo  
2010 Manning Rd.  
Livermore, Ca. 94550





## EAST BAY REGIONAL PARK DISTRICT

11800 SKYLINE BOULEVARD • OAKLAND, CALIFORNIA 94618 • TELEPHONE (415) 531-9300

BOARD OF DIRECTORS: WILLIAM P. JARDIN, President; MARILYN EISSEL, Vice President; WALTER H. CHITT, Treasurer; TED RAOE, Secretary; MARY LEE JEFFERIS, HOWARD L. LOGGINS, JOHN J. LEAVITT, EDWARD C. THURDEAU, Directors

May 9, 1983

Mr. William Allin  
Alameda County Planning Dept.  
399 Elmhurst Street  
Hayward, CA 94544

Subject: Revised DEIR for Las Positas GPA

Dear Mr. Allin:

The EBRPD has reviewed the subject document and offers the following comments.

The discussion of wildlife (p. 4-19 & 20) is very brief and contains at least one piece of misinformation. The San Joaquin kit fox does not inhabit heavy brushland. This rare mammal is a nocturnal hunter which uses eyesight and hearing to find its prey. It could not function in heavy brushland. It inhabits sandy washes and swales in the southern San Joaquin Valley. It ranges as far north as Contra Costa County in grazed rangeland along the western side of the San Joaquin Valley. Each animal moves widely throughout its territory changing dens about every two weeks, except during breeding season when it may remain near the weeping den for 6 to 8 weeks. Because of this misinformation, and because there apparently still has been no survey of the site for the Alameda striped racer snake, the Revised DEIR does not contain sufficient information. Decision makers cannot know whether the project would adversely affect rare or endangered wildlife. The mitigation discussion (p. 4-22) says that a wildlife survey should be conducted but admits that this would not constitute mitigation. Such a survey should have been conducted as part of the effort in preparing the DEIR. Without such a survey, both impacts on wildlife and mitigation measures remain unknown.

The discussion of the impacts of the project upon groundwater levels (p. 4-37) is incomplete because it does not consider what would occur to the groundwater levels in the Central Livermore Basin. Since it is clear from Table 5.27b that demand will exceed water supplies, it is therefore obvious that the result will be an overdraft of the groundwater in that basin. The ultimate result of a chronic overdraft in that water basin upon EBRPD facilities would be the lowering of water levels in the swimming area at Shadow Cliffs Regional Recreation Area. There also would be other serious and adverse impacts upon other public and private entities who draw water from that basin.

The enumeration of the potential adverse impacts of groundwater discharge into the surface water system (p. 4-40) is incomplete in that it fails to note the possibility of adverse impacts upon the quality of the water in the ponds of Alameda Creek Quarries Regional Recreation Area in Fremont. The consultant's recommended mitigation measure to pump the low-quality groundwater to the surface, treat it and discharge it into the surface water system, probably would not work unless the entire Las Positas Valley were underlain by a tile drain field. Such a facility would be extremely expensive, and its costs have not been included in the fiscal impact evaluation. Regardless of whether the groundwater is collected and treated or simply allowed to flow naturally from the subsurface to the surface drainage system, the sewage from the project would constitute a significant component of the "groundwater". Thus, the project has an elaborately disguised surface-water discharge sewage treatment system with serious implications upon the quality of the receiving surface waters and its users (including the EBRPD).

The Revised DEIR (p. 5-84) correctly identifies one adverse impact of the project upon the EBRPD. Because the project is not within District boundaries, there would be a significant increase in demand for regional parkland facilities without a concurrent increase in revenues to the EBRPD. The Revised DEIR is inadequate because it fails to identify a feasible mitigation measure. The project area should be annexed to the EBRPD, so that increased demand for District facilities could be accompanied by increased revenues to it.

The contact person for this EIR is the undersigned who may be reached at 531-9300, Ext. 263.

Very truly yours,

*T. H. Lindenmeyer*

T. H. Lindenmeyer  
Environmental Coordinator  
Planning and Design

THL:lm

May 6, 1983

Mr. Bill Allin  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

Dear Mr. Allin:

In response to Mr. Spiliotopoulos' request, I am enclosing a copy of my views regarding the revised Las Positas New Town General Plan Amendment Draft Environmental Impact Report. They were presented verbally at the April 25, 1983, Alameda County Planning Commission meeting.

I am sorry that a previous commitment did not allow me to stay for the full meeting which I am sure was quite informative. Is a copy of the minutes available?

Sincerely,

*John Stein*  
JOHN STEIN  
Councilmember  
City of Livermore

Enclosure  
JS/cm

RECEIVED  
1983 MAY 11 AM 9:58  
PLANNING DEPARTMENT

BOARD OF SUPERVISORS

RECEIVED

1983 MAY 19 PM 11:40

OFFICE OF THE CLERK

May 6, 1983

FRED F. COOPER  
SUPERVISOR DISTRICT

Mel Hing  
County Administrator  
555 - Administration Building

re: Las Positas and Alternatives

Dear Mel:

I enclose a couple of letters on the above subject which are self explanatory.

It appears to me that you and your staff have been raising financial questions about Las Positas without perhaps recognizing that our Board is committed to 5,000 to 10,000 new housing units in the unincorporated area by 1985.

It has always seemed to me preferable from both planning and economic viewpoints to develop those units in one place rather than have 20 to 30 scattered developments each containing 100 to 400 units.

I am not sure that you and Bill Fraley have yet adequately examined the alternatives of what the county should do with regard to the housing problem if Las Positas is not approved.

Call me if you have any questions.

Yours truly,

*Fred*

Fred F. Cooper

FFC:g  
enclosure  
cc: Bill Fraley

CO. ADMINISTRATIVE  
OFFICE  
1983 MAY - 5 PM 12:15  
COUNTY OF ALAMEDA

LIVERMORE

# BOARD OF SUPERVISORS

FRED F. COOPER  
SUPERVISOR - DISTRICT 2

May 3, 1983

Bill Fraley  
Planning Director  
136 - Public Works Building

re: Alternatives to Las Positas

Dear Bill:

Las Positas is currently going through the hearing process and I of course do not know whether it will be approved or not.

It seems to me that the Board and the public need to have a fairly clear understanding of what is likely to happen if Las Positas is approved versus what is likely to happen if it is not approved.

As you know, our Board has a commitment to ABAG under state law for 5,000 to 10,000 new housing units in the unincorporated area by 1985. Further, legislation is pending in Sacramento that would impose a penalty in dollars upon us if we do not meet the quota. Clearly if Las Positas is approved that would probably meet our quota.

On the other hand, if it is not, we presumably would have to look at ways of coming up with land for 5,000 or more housing units by 1985.

Accordingly I have the following questions:

1. How many housing units can we anticipate approving in Castro Valley and the unincorporated Hayward Hills by 1985?
2. How many can we anticipate approving in Ashland, Cherryland and San Lorenzo by 1985?
3. Under existing zoning in the unincorporated areas around Dublin, Pleasanton and Livermore how many housing units can we expect will be built by 1985?

Bill Fraley  
Page 2

May 3, 1983

4. If your answers to the preceding questions do not reach the figure of 5,000, what alternatives do we have in order to reach that figure?
5. If you answers to the preceding questions do not reach 10,000, what alternatives do we have if we need to reach that figure?
6. What are the likely areas that are not presently in the master plan for housing should be first considered to meet housing needs by 1985?
7. How long will it take for the master plan process to be completed, assuming that EIR's are required?
8. Have any of our financial projections for Las Positas considered possible financial penalties from the state for not meeting our ABAG-state quota?
9. Can we realistically expect that the cities in Alameda County will meet their quota of 34,000 units by 1985?
10. What was the total of new housing units added in the unincorporated area in 1980, 1981, and 1982?
11. Are there any additional facts or alternatives that the Board should be aware of in considering these questions?

If it will take more than two or three weeks to get at least horse-back answers to these questions I would appreciate a call, since I believe we need to look at them fairly soon in the current process.

Thanks for your cooperation.

Yours truly,

Fred F. Cooper

FFC:g

cc: Each Board Member  
Mel Hing  
H. Flertzheim  
Bill Leonard



Tim Hunt  
TRI-VALLEY HERALD

April 19, 1983

Tim Hunt, Editor  
TRI-VALLEY HERALD  
325 South I Street  
Livermore CA 94550

re: Las Positas Proposal

Dear Sir:

Six years ago I supported the Las Positas proposal and oversizing the Valley export pipeline because I saw the housing crisis coming in the East Bay and felt that a single concentrated development at Las Positas would be preferable, to meet the housing crisis I foresaw, to scattered development in many different locations throughout the Livermore-Amador and San Ramon Valleys.

Those who do not feel we have a housing crisis should read the reports to ABAG, which call for 40,000 new housing units in Alameda County by 1985 and 43,000 new housing units in Contra Costa County by 1985. The Bay Area Council has pointed out that our ability to attract new jobs and new industry will be undercut if we do not increase our supply of housing, and of course the exodus of electronic industries from Santa Clara County is primarily due to housing problems there.

Because it will cost the new city manager \$250,000 to buy in Berkeley a home comparable to the one in New Jersey that he sold for \$73,000 recently, the City of Berkeley will contribute \$109,000 towards the cost of his Berkeley home. Homes in the Bay Area cost two to three times what comparable homes cost in New Jersey, Ohio, Illinois and most other parts of this country, even though the other states also have the high interest rate problem. The only reason for the price differential is that the other states have an adequate supply of housing while the Bay Area does not. Interest rates are not a factor but no growth policies and high cost, partially resulting from no growth policies are the reasons. We urgently need to expand our supply of housing in the East Bay.

Under state law ABAG has assigned Alameda County the job of supplying at least 5,000 new housing units in the unincorporated area of the county by 1985 and has assigned similar quotas to our 14 cities. Our Board has accepted the quota and indicated also our feeling that the unincorporated area will need to develop 10,000 units by 1985 under the state-ABAG quota system, because we doubt very much that the cities will all meet their quotas. Our Board's recent experiences with major local opposition to 142 rental housing units in Ashland and a mere 85 homes in Sunol underscores the problems we have, and the problems that the cities have and will have, in meeting the state-ABAG housing goals, yet if those goals are not met housing prices will continue to escalate and gentrification in our urban areas where young couples who are unable to buy new homes in the suburbs buy run-down victorian homes and fix them up, thereby pricing lower income families out of the market, will continue. Legislation is pending in Sacramento to penalize the county financially if it does not meet the state-ABAG quota.

A continual problem when the Board of Supervisors or a city council considers a rental housing or new home project is the fact that 50 or 100 local residents, all of whom are voters, come in and object to the proposal and tell us to send it somewhere else. On the other side is one single developer, frequently someone who does not even vote in the jurisdiction. The people who need the housing and will eventually live in the development are simply not present because the people who will move in 18 months later are not aware of the fact that, if the development is built, this is what they will want 18 months from now. The net result is that all of the political pressure is against development and it becomes quite difficult for the elected officials involved to adequately take into account the needs of the people who need the housing when they are not there and when the elected officials know that if they vote yes they will have 100 voters mad at them, but if they vote no then no voters at all will object.

When we look at the Livermore area even People for Open Space, an environmental group, issued a study in October pointing out that present planning in the San Ramon and Livermore Valleys stresses jobs and industry too much and does not provide for enough housing, in relation to the proposed office and industrial development. In early March People for Open Space went even further and stated that the 2 percent residential growth rate adopted by the Cities of Livermore and Pleasanton simply isn't enough to provide homes for the people who will be working at the thousands of new jobs to be created by such projects as the Hacienda Business Park in Pleasanton.

Six years ago the City of Livermore opposed Las Positas on the basis of its then policy against growth. The City's present position is that Las Positas should develop within the City of Livermore because the City can provide "superior planning" in that area. Yet Livermore

in the past has opposed oversizing the export pipeline and has gone along with proposals for 90,000 new jobs in the Livermore-Amador Valley over the next eighteen years, even though Livermore knows there is inadequate housing planned for those jobs. I cannot agree that it is "superior planning" to participate in a process which expects 90,000 jobs in the Livermore-Amador Valley and 80,000 jobs in the San Ramon Valley with only perhaps 30,000 housing units planned for the workers in those jobs, which means they will have to commute from Manteca, Stockton, Concord and Fairfield.

By the end of March it was clear that there was no agreement among the leadership in Livermore on whether the 2 percent growth limit should be studied and revised. This is hardly "superior planning". Further, by the middle of March it was clear that Livermore could not even come to an agreement to meet with representatives of Dublin and Pleasanton to discuss growth in the Valley.

Even if one could validly argue that Livermore at present is capable of "superior planning", one must take into account the "yo-yo effect" of Livermore politics and elections. If Las Positas developed within the City of Livermore, every two, four or six years the no-growthers would take control of the Council and effectively stop development of Las Positas for two to four years. This means that full development in Las Positas could take 30 to 40 years. To develop Las Positas within a ten year time frame, in order to meet our immediate housing crisis, requires that a major corporation invest \$15 million to \$20 million at the outset in order to provide streets, sewers, sewage capacity, water, street lights, etc., and no competent company in its right mind will invest that kind of money subject to a "yo-yo effect" city council, when it is clear that only the Board of Supervisors can implement stable land use policies that would allow full development to be built and sold within a ten year time frame.

I should make it clear that, while I am convinced that we have a housing crisis, that Las Positas is a major part of our response to the crisis, and that it cannot be developed within a reasonable time frame in the City of Livermore, this does not mean that I do not see major questions which must be resolved as we go through the planning process. These obviously include sewage, water, financing of services, and relationship of the development to roads, schools, and commercial developments in the Valley.

These serious questions need to be addressed in the planning process and I am sure that input from the City of Livermore, as well as other agencies and private citizens in the Valley, will be useful in helping me and the other Members of the Board of Supervisors develop solutions to the problems necessarily posed by a major development.

It fascinates me that most of the opponents of Las Positas frequently drive the freeways between Castro Valley, Hayward and San Leandro. Castro Valley is an unincorporated area containing 50,000 people, situated adjacent to the Cities of Hayward and San Leandro, both of which have substantial industrial development. Castro Valley works. If Las Positas is approved it will become an unincorporated area of 50,000 people adjacent to the Cities of Livermore and Pleasanton, both of which plan substantial industrial growth. Las Positas should probably be primarily residential, as is Castro Valley, but this will be difficult to do unless the Cities of Livermore, Pleasanton and Dublin agree to follow the suggestion of the League of Women Voters to establish a tax-sharing agreement. Such an agreement would be possible only if Livermore is willing to sit down and discuss it, and perhaps your newspaper can help convince the leadership of Livermore that the example of Castro Valley and Hayward and San Leandro is a viable one and that tax-sharing is appropriate.

In closing, I believe that just about everyone now agrees that we have a housing crisis in the East Bay. Some people, and some groups, will argue that major developments should occur within existing cities rather than at Las Positas. I hear this refrain raised from time to time, particularly by environmental groups, but have never noticed those groups as being present when efforts have been made to develop high-rise units around BART stations in Rockridge and Concord, to develop Mountain Village in Oakland, etc. In local government we frequently hear the refrain "it's a good idea just put it someplace else", but the people who sing that refrain never show up when you attempt to put it someplace else.

People need to start asking themselves some tough questions like "do we have a housing crisis?", "if our housing prices are double what they are in most of the rest of the country, even though they have the same interest problem, what do I think is the cause other than the fact we have not built enough housing units to have supply keep up with demand?", "do I think my children or your children between 12 and 25 will ever be able to own a single family home in the Bay Area?", "if I am willing to take the time to oppose new development near where I live, should I not be willing to take the time to go support it someplace else?", "if the only people who show up are the neighbors and voters who live nearby and are opposed, who is going to represent the people, including your children, who are going to need housing units in the future?"

Thank you for giving me the opportunity to express my views. Hopefully this will assist those agencies and individuals who will be commenting on the proposal as it comes before us at public hearings.

Yours truly  
*Fred F. Cooper*  
Fred F. Cooper



RECEIVED

1983 MAY -4 PM

12212 Atrium Circle  
Saratoga, Ca. 95070

Phone 408/ 996-2742

May 3, 1983



SECRET

DEPARTMENT OF THE ARMY  
SAN FRANCISCO DISTRICT, CORPS OF ENGINEERS  
211 MAIN STREET  
SAN FRANCISCO, CALIFORNIA 94105

RECEIVED

1983 MAY -4 AM 10:56

1983 APR 29 PM 11:29

To: Mr. Betty Goble  
Asst. Planning Director  
Alameda County Planning Dept.  
409 Elmhurst Street  
Hayward, CA 94544

Subject: Las Positas, Revised PEIR

Your request for comments from this office was received on April 1, 1983 by your letter (retrcc) dated March 30, 1983.

( ) The proposed activity is an administrative action and therefore will not require Department of the Army authorization. However, any construction resulting from this action may require Department of the Army authorization. For additional information please contact our Regulatory Functions Branch at 415-974-0418.

(X) The proposed construction project (ccy) (d11) (g9d) require Department of the Army authorization under Section 404 of the Clean Water Act. A copy of our pamphlet "U.S. Army Corps of Engineers Permit Program, A Guide for Applicants," (is included). For additional information please contact our Regulatory Functions Branch at 415-974-0418.

(X) The following Corps projects or studies may be impacted:  
None

(X) Any impacts on wetlands, threatened or endangered species, other valuable fish and wildlife resources, or on cultural resources are among the important environmental considerations for all Corps permit applications.

Questions concerning our environmental review can be referred to Mr. Gary Bergholter at 415-974-0444. Thank you for including us in your review process.

CE:  
Proj Files EIR/004 Review  
SPDF-Rdg  
SPDF-R  
SPDF-TH  
SPDF-IF Rdg  
SPDF-TH  
SPDF-TH  
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SPDF-TH  
SPDF-TH

ROBERT R. HOOLY  
Chief, Project Evaluation Section  
Technical Support Branch

Alameda County Planning Commission  
399 Elmhurst Street  
Hayward, California 94544

Gentlemen:

Re: Las Positas General Plan Amendment and  
Revised Draft Environmental Impact Report

I am a Las Positas Valley (North Livermore) landowner in favor of the proposed General Plan Amendment. My 40 acre parcel stems from a family purchase of 160 acres in 1868.

From that early day to this, farming here has been borderline, due mainly to dependence upon rainfall and poor soil quality.

Although borderline agriculturally, Las Positas has been, and still is, a pleasant, healthful area. In my opinion, it is ideally suited for the development of a fine, new community as set forth in the General Plan Amendment, the implementation of which would be an achievement for Alameda County.

May I urge your favorable consideration of this project.

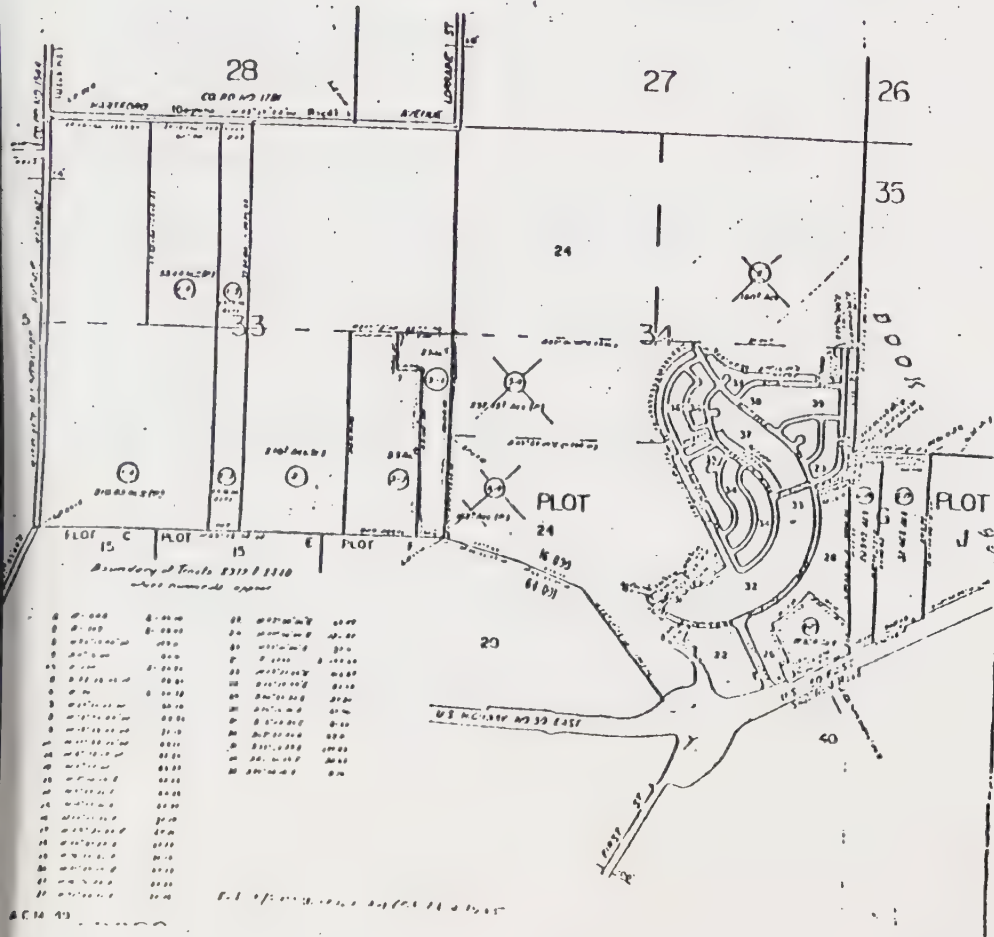
Sincerely,

*Frances A. Speakman*  
Frances A. Speakman





B O O K 9 9 B



Over the years that this project has been seeking approval from the County there has been a tendency on the part of the county to dismiss concerns that have been raised about the project as coming from 'no-growthers' and therefore somehow invalid. I believe the county makes a serious mistake in treating them in this way. There have been some very real problems in this valley as a result of too rapid growth in the 1960's - severe school overcrowding and the worst space problem in the Bay Area - and residents are understandably and reasonably concerned in not having a repeat of these problems.

Additionally, there are some very serious problems with this proposal which the County should be concerned about.

I would like, if I may, to ask you to try putting yourselves in our shoes and view the Las Positas proposal from our perspective. What do we see?

We see once again the same poorly prepared and fraudulent proposal, lacking any real detail and documentation over how it is going to deal with the complex situations and problems that a new town entails. Last time we were told that Livermore and Pleasanton were unable to attract industry because of their 'poor' planning and/or zoning but that Las Positas would be able to do so because of superior planning and would therefore be financially successful. This time, we are told that Livermore and Pleasanton are approving too much industry and that Las Positas is needed as a bedroom community to house all the people who will be working in those industries. Bedroom communities traditionally have not paid their way.

We see a proposal that, from the beginning, has been presented to the County rather like a used car and in a highly political manner. When questions are raised about major aspects of the proposal we are told by the project sponsors that these are details to be worked out later, after a General Plan Amendment, even though it is obvious that if the answers to such questions raise real doubts about the viability of the project that it is rather late to find that out after a General Plan Amendment has been passed.

We see a proposal that purports to be a New Town but doesn't deal with the reality that out of some 30 new towns that have been started in the U.S., only three, to my knowledge, have been successful, and these three possessed a very important characteristic that Las Positas does not. In these other new towns virtually all of the land was under one ownership, not several, and that is a very crucial point.

We see a proposal where the sponsor stands to make some sixteen million dollars the day the General Plan Amendment is passed, and where this same sponsor is a major contributor to and major fund raiser for at least three members of the Board of Supervisors.

We see that for the biggest development proposal ever to be submitted anywhere in Alameda County, the project sponsor has been allowed to develop the EIR for the project rather than have it done by an independent and objective consultant. It is encouraging that the County has now had an independent analysis done of the fiscal impact but it would be even more encouraging if the County were to also have an independent analyses done of the other major parts of the proposal. This fiscal analysis graphically lays out the major problems that exist with the developer's proposed method of financing and the risk that the county faces.

We see a County that itself has major financial problems and is facing a multi-million dollar deficit; a County that is having trouble running its jail and its hospital and even its animal control shelter; a County that is responsible for several fairly large urban areas and has not demonstrated that it has done a particularly good job of any of them since, for the most part, they lack amenities in comparison with most cities. We see this same County trying to tell us that it has the capability to succeed with a New Town where most have failed. Truly it seems a classic example of the axiom that if you can't solve your own problems, you go muddle with someone's else's in hopes of diverting public attention.

We see a Board of Supervisors in which a majority have consistently refused

obvious that if the County were to undertake this responsibility, that it would add immeasurably to that work load. If the Board is only poorly handling what they have now and what they are required by law to do, is there any reason to believe that they will do well with a New Town, which they are not required to do?

We see a County that has a poor record of cooperation at least with the public agencies in this valley and has put itself in an adversarial rather than a cooperative role in a number of situations. We who live in the Valley believe we are perfectly capable and have the right to manage our problems without having Big Brother from over the hill constantly criticizing and attempting to run roughshod over Valley residents.

In short, we see a massive proposal that has serious implications for the Valley in terms of air quality, traffic, water supply and protection, sewage treatment capability, school impact, and fiscal impact, and we see a County that at present is handling rather poorly several of the major and important programs that it is mandated to perform, and yet is proposing to take on a municipal government role - a role that it has yet to demonstrate that it can handle well. In short, neither the County nor the project sponsor have a great deal of credibility with Valley taxpayers.

It is my personal belief that the County does not have the capability to ensure the appropriate development of such a major project and that, in any event, the Board of Supervisors does not provide the kind of local control and accountability that residents of such a community have a right to expect. Trekking to Oakland every time you don't like what is happening, is not local accountability or control.

I believe the County should think very seriously about the problems with this project and their ability to deal with them before it plunges into something that has the potential to become a financial fiasco for Alameda County taxpayers. Their fiduciary responsibility to the taxpayers requires no less.

D. P. P.



**HALEY, SCHENONE, BIRCHFIELD & SMITH**

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400 B STREET  
P.O. BOX 450  
HAYWARD, CALIFORNIA 94541  
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ALAMEDA COUNTY  
ATTORNEY AT LAW  
JUDICIAL & LEGAL  
COUNSEL  
PUBLIC COUNSEL  
CITY OF ALAMEDA

Alameda County Planning Commission  
April 25, 1983  
Page 2

April 25, 1983

Alameda County Planning Commission  
390 Pinhurst Avenue  
Hayward, California 94544

RE: Las Positas General Plan Amendment

Members of the Commission:

This office represents the Las Positas Land Company. A review of the revised Draft Environmental Impact Report shows that a modification to the proposal by the Las Positas Land Company was not set forth by the report.

On Page 2-13 of the revised Draft Impact Report the Public Land Fund is described as being comprised of fees collected at time "an unsubdivided parcel is sold, or if a landowner wishes to develop, at the time a tentative subdivision map is approved by the County."

In September, 1983, in response to comment, The Las Positas Land Company modified its proposal so that the fees payable to the Public Land Fund would occur at the time of recordation of the final map.

It was further proposed that at that time, since practically all parcels will include portions for open space or for other public uses, land could be dedicated in lieu of fees to the extent of the value of the land dedicated.

This modification was made clear in The Las Positas Development Control and Financing Program submitted to the Planning Department on September 10, 1982. The Las Positas Land Company has represented this modification as part of its proposal since that time.

Through this letter it again reiterates that the modification as set forth on September 10, 1982 and in this letter are a part of the project. It is intended that this letter act to correct the misstatements in the Draft Environmental Impact Report and that the public record also so reflect.

Respectfully,

HALEY, SCHENONE, BIRCHFIELD & SMITH

By Paul J. Schenone  
PAUL J. SCHENONE

BJS:km  
cc: Mr. Haley  
Ray Gowers  
Dorothy Scott  
J. M. Smith  
Lee Han

1025 Xavier Way  
Livermore, Cal., 94560  
April 25, 1983

Alameda County Planning Commission  
399 Elmhurst Street  
Hayward, Ca., 94544

Commissioners:

I would like to address my remarks primarily to the Bellrose residents, and at the same time give them some history regarding the Bellrose development.

Some 20 years ago, Frank Cardella and Manuel Minoglia purchased 80 acres of land from Joe Silva. They then petitioned the Alameda County Planning Commission to divide the 80 acres into 16 parcels. This 80 acres borders my south boundary line.

We did not want the development of the many people it would bring into our farming area, so we voiced a strong protest before the Alameda County Board of Supervisors. A few days later, we were invited to a meeting with Supervisors Chester Stanley and Francis Dunn. After the meeting, we withdrew our opposition based on the following information given to us.

The supervisors informed us that there was a grant demand for the type of properties Bellrose would create. That people should have the right to purchase property in the Las Positas area to live on if someone was willing to sell property to them. The supervisors also told us not to be selfish. With an increasing bay area population, people needed new areas to move into. They said that their studies indicated that the Las Positas marginal lands were not indicative to successful or profitable farming. They predicted that a land use change from agriculture to planned development would some day happen here in Las Positas.

It is not right for anyone now living in Bellrose to feel that they have their home in Las Positas, but no one else should move in. Furthermore, the Las Positas development is needed to furnish the homes for the many new people

who still are needed to fill the jobs being created by the industrial parks in the valley. The development itself will create many jobs and we all know people are looking for jobs.

So to the members of the Alameda County Planning Commission, I urge you to support and approve the Las Positas General Plan Amendment.

Very truly yours,

*Thornton K. Taylor*  
Thornton K. Taylor

OFFICIAL POSITION STATEMENT OF THE CITY OF LIVERMORE  
REGARDING THE PROPOSED LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING

Mr. Chairman and Members of the Planning Commission, my name is Dale Turner. I am the Mayor of the City of Livermore, and I am here this evening to present the official position of the City of Livermore on the proposed Las Positas General Plan Amendment and Rezoning. Prior to presenting the City's position, I would like to take this opportunity to thank the Planning Commission for scheduling this Public Hearing in the City of Livermore. However, I feel I must also be somewhat critical of the County for scheduling this Public Hearing on the same night as the Livermore City Council meeting. Consequently, those people who have business to conduct with the City, and who may also have questions and concerns about Las Positas, will not have the opportunity to present their views on Las Positas in a familiar and convenient setting. Likewise, several members of the City Council will also be denied the opportunity to participate fully in tonight's proceedings and to hear, in person, the comments and concerns of the citizens who elected them.

The revision to the June 1982 Draft Environmental Impact Report (DEIR) has been reviewed by the City. Both the old and the new facts contained in the DEIR do nothing but reinforce the City's opposition to the proposed Las Positas development. These facts indicate Las Positas will result in adverse impacts on the City of Livermore and the Valley in general. Therefore, the City is forced to object to the current Las Positas General Plan Amendment and Rezoning in an unincorporated area which is contiguous to the Livermore City boundaries on three sides. The basis for the City's objections are:

First, the City has planned to serve the Las Positas area for the past 24 years. This is supported by the fact the area has been part of the planning area of the City's General Plan since 1959. Also, the City has spent well over \$800,000 to install oversized sewer, water, and other utility lines to serve the area north of Interstate 580. In addition, the City has made applications for and supported applications that resulted in additional and expanded wastewater treatment facilities, and has actively participated in the Livermore-Amador Valley Water Management Agency (LAVWMA). The City feels these past and present actions indicate our willingness and our ability to provide the public services and facilities necessary to serve the Las Positas area which logically belongs in the City's Sphere of Influence.

Second, the proposed General Plan Amendment and Rezoning is only partially consistent with adopted regional policies relating to urban growth. The proposal is not consistent with County General Plan policies that encourage all new urban development to be municipal; and, lastly, the proposal conflicts with Local Agency Formation Commission (LAFCO) priorities requiring annexation to an existing city prior to creating new County service areas.

County approval of the Las Positas project in an unincorporated area contiguous to Livermore would establish an unmistakable precedent for de facto County control over land use matters in fringe areas adjacent to cities. From the City's perspective, this is not sound land use planning, as this action would signal the County's intent to take land use planning decision making authority away from all Alameda County cities which are bordered by developable, unincorporated land.



The development of Las Positas will require the formation of a County service area to provide sewer and other municipal-type services to serve the development. The proposed County service area would add an extra and unnecessary government entity to the Livermore-Amador Valley at a time when the people of the State are demanding less complexity, greater efficiency, and more responsiveness from their local governments.

Several municipal services for Las Positas would have to be provided by Alameda County. Because of the distance between present County Sheriff, Fire Patrol, and Public Works facilities, and the Las Positas area, the cost of providing these services would exceed the normal service costs in cities where good planning has resulted in compact, infill development. Also, under current mutual aid arrangements, Livermore Police and Fire Departments back-up the County Sheriff's Department and Fire Patrol in emergencies. During these times, the City provides considerably more mutual aid to the County than it receives in return because of the widely-dispersed County population surrounding Livermore and the limited availability of County personnel. The development of Las Positas would worsen the existing imbalance to the point where the basic equity of existing mutual aid agreements would have to be reexamined. In addition, residents of Las Positas would receive the benefits of the Livermore Municipal Library system and City-maintained parks without paying their share of the costs for these facilities or services.

Future Livermore planning and growth options would be foreclosed by the development of Las Positas.

Primary sewerage treatment would be provided by a discrete wastewater treatment plant which utilizes spray irrigation for disposal. Since no technologically-proven back-up treatment is provided, the City would probably be prevailed upon, for humanitarian reasons, to provide back-up treatment and disposal facilities including capacity in the LAVEMA export pipeline, if the discrete system failed or became inoperational. Unfortunately, if this occurred, it would be at the expense of the residents of the City of Livermore. Further, questions have been raised about how land application of effluent has affected groundwater quality in the Livermore-Amador Valley.

For better or for worse, the Las Positas Development would be perceived as part of the City of Livermore, yet the City would have no control over the development conditions or planning standards that will be molding this County stepchild that is being forced upon us.

The Las Positas area is owned by 101 different landowners, all of whom are not supportive of the proposed plan. Consequently, there is no way of guaranteeing the plan will ever be adhered to. It seems that the numerous property owners will be competing with each other to secure a high rate of return on their land uses which can only result in additional uncoordinated urban sprawl in the Valley.

The proposed plan indicates approximately 85 percent of the proposed housing to be constructed will be affordable to low and moderate income families. This seems highly improbable, given the fact the cost of the basic infrastructure will be paid by fees collected from building permits.

April 25, 1965

Las Positas' per unit capital development fee has not been stated. However, it would be logical to assume these fees would be significantly higher than Livermore's since no infrastructure exists. Therefore, the stated affordable housing goal appears to be a myth.

In summary, the City of Livermore believes there are significant flaws in the proposed Las Positas Development Plan. The proposal to form a County service area to provide services to Las Positas would create an extra level of government in the Livermore-Amador Valley and increase the cost of municipal services for future residents of Las Positas and especially for the residents of the City of Livermore.

The proposed public services plan, especially in the areas of sewerage *0.1.2* treatment and disposal, fire, police, and library are still inadequate. Lastly, future residents of Las Positas would be required to pay extra taxes and service charges for municipal-type services which other County residents currently receive through their share of property tax revenues.

Of equal or greater importance is the fundamental principle that urban-type development should occur in existing cities and not in unincorporated areas, particularly those areas on the fringes of existing cities. The City of Livermore strongly supports this principle. It is for these reasons why the City of Livermore urges the Planning Commission to reject the current Las Positas General Plan Amendment and Rezoning.

Mr. Chairman,

I am Archer Putch, representing the Livermore-Amador Conservation Group of the Bay Area Sierra Club. We appreciate this opportunity to express the views of our members on the proposed development in the Las Positas Valley.

The Sierra Club supports responsible growth and development within the existing communities of the Valley that is consistent with the protection of the environment and our quality of life. We are concerned about Las Positas being quite inconsistent with examples of good land-use planning, in terms of growth of a type and at a rate the Valley can effectively absorb or afford. We are concerned that future development be viewed, planned, and authorized with a Valley-wide perspective, rather than piecemeal, and that necessary support services be the responsibility of the developer, rather than the existing taxpayers.

The Draft Environmental Impact Report by the Alameda County Planning Department is a comprehensive report prepared in a professional manner which identifies significant impacts of the proposed project. Many of these impacts lead to the destruction of the environment in the Livermore Valley which is not acceptable to the Sierra Club and to the great majority of citizens of this Valley.

Of even greater concern is the fact that Las Positas is not the only major development proposed for the Valley, and the cumulative impact of all developments being proposed has not been studied. Obviously the impacts of all projects significantly increases the degradation of the environment beyond that identified in this draft EIR. An EIR should be prepared by the County which considers the cumulative impacts of all developments proposed for the Valley.

The proposed development of Las Positas is traditional leap-frog development in the county, NOT a "new town". This urban development adjacent to and partially surrounded by the present city would forever be a segment of the present community, and a "new town" in name only. It would depend on adjacent communities for services and jobs. Approval of it would be contrary to city, county, and state goals to promote in-filling and contiguous urban development. The proposal would require duplicating virtually all services available from the City of Livermore and the Livermore School District;

1. Based on previous plans approved by all agencies, Livermore has spent 3/4 of a million dollars of public funds in providing facilities to service the area. It would be uneconomical and a waste of public funds for a county agency to duplicate these services. For this reason alone, Las Positas violates recognized and established principles of good planning and local general plans.
2. With limited commercial and industrial potential, Las Positas could not be a self-sustained community.
3. Approval of a county service area would severely restrict desirable future growth for Livermore.

4. Only a limited supply of public service facilities are available. Development of Las Positas would be like a sponge soaking up many of our local facilities without the necessary fee-structure to compensate the city, the school district, or the recreation district.

This duplication of facilities is a major reason <sup>why</sup> Las Positas is so expensive to the taxpayers of the city, the county, and the future residents.

The independent financial consultant anticipates huge drains on the already tight county budget for the first 16 years of the project to provide general government, health and social services, and police protection. Table 5.48 shows deficits of \$762,200 for the first five years, and deficits of \$314,900 for the second five-year period. In addition, Table 5.43 shows that additional deficits in the public land acquisition fund and the capital improvement fund would require revenue from public agencies, presumably Alameda County. As the environmental impact report states, "county residents will, in effect, subsidize Las Positas."

The financial consultant suggests two alternative financing methods which would mitigate the financial impact of capital financing from the county budget: a conventional special assessment district, or a Community Facilities District. The Sierra Club urges the adoption of either of these alternative financing methods to reduce the public subsidy of Las Positas.

It is unusual for the Sierra Club to be as concerned with the financial impacts of a project, but there has never been a project of this magnitude, requiring the expenditure of so much public funds to insure the success of a private project.

The disposal of sewage effluent in the Las Positas Valley by spray irrigation could significantly impact the Valley water supply. The existing communities in the Valley export sewage effluent at considerable expense to the deep parts of San Francisco Bay to prevent degradation of both downstream water supplies and our own groundwater. The ground water in the Las Positas Valley is of poor quality and near the surface. Land disposal of effluent in this area would increase the water levels until natural run-off or inter-basin mixing occurs. The migration of sewage components from a land-disposal site as proposed to its underground water supply is little understood by experts in the field, and poses a significant risk to the Valley's water supply. Until the hydrology of this migration is understood, export of effluent to San Francisco Bay should be required. J./

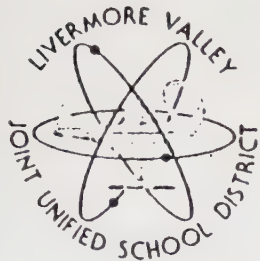
Insufficient water exists to supply both existing communities and Las Positas unless the State Water Project is completed. We note that the overwhelming rejection of the Peripheral Canal recently by state voters makes completion of the SWP doubtful, and that, according to the EIR, without these facilities, demand would exceed the available supply in all cases (critical years, dry years, and average years).

We suggest that this impact be mitigated as suggested by the consultant by a delay in actions by the county on this proposed Plan Amendment and rezoning; or a conditioning of these actions to delay any further implementing actions by the county until such time as state studies are completed.

The proposed project and the cumulative effects of other developments proposed and planned for the Valley would result in unacceptable Valley-wide congestion. The long-term cumulative effects of this congestion on air quality is not considered in the existing EIR.

For all of the above reasons, the Sierra Club finds that the proposed development is poorly planned, that Las Positas will result in loss of open space, degradation of both air quality and ground water, loss of rare plant forms and wildlife which now exist in the Las Positas area, and will require a massive support of private development with public funds. The Sierra Club recommends denial of the proposed development in the Las Positas Valley.





EDUCATION CENTER

685 LAS POSITAS BOULEVARD • LIVERMORE, CALIFORNIA 94550 • TELEPHONE 447 9500

William H. Fraley, Planning Director  
Alameda County Planning Department  
April 22, 1983

Page 2

April 22, 1983

William H. Fraley, Planning Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

Dear Mr. Fraley:

This is in response to your letter of March 30, 1983, which transmitted the Revised Draft Environmental Impact Report on the Las Positas General Plan Amendment Consideration.

It is still the position of the Board of Education that there must be a *H.I.I.* guarantee, prior to any approval of the Las Positas development, that adequate school facilities will be available when and where they are needed. The Board must be assured the construction of new schools in the development is accomplished in a manner that will avoid the overcrowding of existing schools and the potential reduction of the quality of education that overcrowding can cause.

The revised DEIR does not provide these guarantees and assurances. Three alternate means of financing new school construction are mentioned in the DEIR, none of which assures the District of the timeliness of construction. These are as follows:

1. Developers' fees. There is a serious problem with this method of raising funds for school construction in that by the time enough fees have accumulated to even start construction of a school, the project will be close to the end of Phase I. This will inevitably result in the overcrowding of existing schools, further resulting in a negative impact on the quality of education.
2. State Building Fund. This method is not a reliable means of ensuring the availability of schools when needed since the demand for these funds may exceed their availability. Funding of school construction projects under this program is based on a system of priority points that weighs heavily in favor of existing and imminent enrollment. There is no assurance the Livermore School District will have high enough priority to receive any of the available funds.

3. Special Assessment District/Community Facilities District. The financial consultant, while proposing these assessment procedures as alternate mitigating measures, fully discloses the risks associated with their use. The Board agrees that these funding measures are not reliable.

The surest way of providing schools when and where needed is for the sponsor *H.I.I.* to advance fees sufficient to construct all Phase I schools. As development fees are collected, these should be placed in a school construction revolving fund to finance school construction in subsequent phases. To accomplish this, a part of the so-called Advance Fund of \$14,000,000 should be designated for school construction.

Mitigation of the Board's concerns, as expressed above and in all previous *H.I.I.* correspondence, should be a condition of approval of the sponsor's application for a General Plan Amendment. Furthermore, to ensure these conditions remain binding, it is proposed that an agreement be entered into between the County of Alameda and the Livermore School District to the effect that no unilateral action will be taken in the future to alter or waive these conditions. This agreement will guarantee that school facilities will be available in a timely manner. The Livermore School District will then be able to meet its obligation of providing quality education for all of the students within its boundaries.

Sincerely,

Betty Carrell, President  
Board of Education

dm

Mr. Chairman, Board Members:

My name is Susan Steinberg, and I speak as Chairman of the Livermore Committee for Quality Education. Our concern for the future of the educational services provided in this area has led us to strongly urge you to recommend denial of the proposed Las Positas project.

Since the passage of Proposition 13, the Livermore School District has struggled with an increasingly constricted annual budget. Initial cost-cutting measures merely represented acceptable economics. Since then, however, with District buying power decreasing as all their costs escalate, budget cuts have begun to seriously affect the fine quality of our education system. Now, with finances strained to the breaking point, there is no question about the consequences: valuable parts of our educational program have already been lost, and others are on the chopping block for this year, with no sure relief in sight.

In view of this crisis in education funding, the Livermore School District simply cannot be forced by the county to provide for the proposed new development in Las Positas Valley, which would not be under legal obligation to make any financial commitment or property donation to the School District, as city developments must do. H.2.1 P.4.1

Although the developer has made enthusiastic public statements about getting schools built quickly, this is merely a familiar phrase used by all such investors seeking project approval and public support. There has been no offer of legal commitment to the District to ensure that the extensive buildings, staff, and educational materials and services needed for the residents of this development will be paid for out of funds generated by the project, or offered by the developer. P.4.2 H.2.2

Thus it is a development whose educational requirements will not be self-supporting, but will drain the last slender resources of the Livermore School District, and effectively destroy the quality of the existing educational program.

On behalf of the students of this district and their families, and on behalf of the proposed development's prospective residents, we ask you to recommend denial of Las Positas New Town.

Las Positas Land Company is proposing a Newtown in the Las Positas Valley.

This town is to be financed by County taxpayers and by the residents of the new town. Supposedly, affordable housing is the necessity for this town. There is no guarantee in any section of this project of so-called affordable housing. In fact, the fees for the privilege of living there are so high it is questionable if anyone will be able to afford it.

To start, the monthly water in \$12 and sewer fee is \$30 for a total of \$42 a month to start! This is not guaranteed to be the actual cost when someone is actually in a house. More than likely, they will be higher and those are only two fees being proposed for the future residents.

Next, all developments are usually proposed for land owned in total by the developing company, this is not the case with Las Positas. These developers propose to build a town on 4400 acres they don't own in total! In fact, they own or have futures on approximately 2400 to 2900 acres, the rest belongs to other independent landowners.

There are approximately 40+ landowners in the valley; there is no way that the land company can keep all of them happy. Some are going to want different zoning, land use and of course, price. We already see this happening.

Now, lets talk about price. The Elk says the proposed price per acre is \$10,000. Who determines this price? If people are going to sell they ought to have the right to determine if this is a satisfactory figure. No one in this valley was ever approached by Las Positas, except probably some of the older farmers who want out of the farming business. It seems to me that before a project of this magnitude could even be put before the board that all landowners in the valley should be apprised of the proposal and be in agreement. If this is not the case, then the land company should own or have futures on the whole valley, 100%, before this project could even be considered. P.5.1

for this project where it belongs, on LAS POSITAS LAND CO., not on the average person who is just trying to protect his home and his rights. I feel if this project goes through as proposed, the landowners of small parcels will be forced out with nothing to replace what we have now. You are talking about taking our homes; if that be the case, then I want compensation and that compensation should be in the form of an amount of money that will enable me to go forward and replace my home. The way it is set up now, I will be left holding the bag with assessments and fees I cannot afford. Then when I'm forced out, the sale price will go to pay for these fees and leave me with nothing to replace my home. I say this is selfish on the part of LAS POSITAS LAND COMPANY, its your project, you foot the bill! You are the only one who stands to realize benefits from this project. You want it, you pay for it..''

I leave you with one last statement. Taxpayers have you given any thought to who is responsible and who will pay for the proposal it isn't completed or if the sewage facilities fail in this type of soil. Think about it!!

**DUFFEL**

DUFFEL FINANCIAL AND CONSTRUCTION COMPANY

April 13, 1983

ALAMEDA COUNTY PLANNING DEPARTMENT

RECEIVED  
1983 APR 14 AM 11:03

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

Attention: Mr. Bill Allin

Re: Los Positas

Dear Mr. Allin:

Enclosed is a copy of the letter which we sent to you in December. I would appreciate your including this letter with all the other responses to the Environmental Impact Report for the above project.

Very truly yours,

*Van Norden Logan*  
Van Norden Logan  
Vice President

VNL:ew

Enclosure

- FINANCIAL
- DEVELOPMENT
- CONSTRUCTION



Afterall, everywhere else this is the case and should be one of the requirements of this project's acceptance. This should be a major requirement of this proposal then there would be no problem with 40+ landowners to satisfy. Only one landowner, Las Positas Land Company, would have to be satisfied with zoning, price and land use. I say this is a major fault of this project and should be a requirement, in fact as one of the unconsulted landowners who is being told what is going to be done with my land, I demand that this be a major requirement of acceptance. If Las Positas is unable to own the valley 100%, then they shouldn't be allowed to develop this proposal. I feel the only reason this proposal is being put forth as it is, is so that Las Positas will be able to develop or sell for development their various parcels of land scattered throughout the valley. They wouldn't be able to develop their land as it stands now because they are too scattered and it would be considered LEAPPROG development which is undesirable and would have less chance of being approved. Therefore, their best approach is this proposal, besides they could stick the taxpayers with the costs once they are out of the picture. Right now this development company wants Carte Blanche--everything their way at very little cost to themselves and everything to the landowners and Alameda Co. taxpayers.

Also, as an unconsulted landowner, I resent the fact that the development company wants to put up only 14 million dollars, not only are they willing to put up a small amount of money, but they want the County to pay it back! Now I ask you that sounds pretty greedy to me! They intend to make money two ways. Buy the land cheap and sell it high once they are able to sell this project to other developers and on top of that, they want their \$14 million dollars back! Meanwhile, the landowners who don't even want the project are forced into assessments they can't afford and more than likely will lose their properties to assessment and development fees. The County and residents

all taxpayers will start to pay for this project in one way or another; through a special tax or some such situation. The County can't afford to pay for it!! So taxpayers beware, you will as this project now stands. There is no extra money in the budget to spread around on a private land company's project, nor should there be whether there is a surplus or not.

Therefore, I say if Las Positas Land Co. wants this project so badly, let them foot the bill and make their profit, of course; however not at the expense of the landowners and residents of Alameda County. If they want it, let them pay for it! One requires a much larger sum than \$14 million because that won't even get the project started properly especially if they are going to use that for a wastewater treatment plant, sewage facilities, roads, lighting, etc. The second point is to eliminate the payback to the land company so that the burden to the County is eliminated.

The funding for this project is very weak. It leaves the landowners to foot the bill for most improvements, costs that the average man cannot afford. If we are squeezed out of our homes, at least leave us with a way to be compensated for our loss. Even if we could get someone to buy our homes for development, we still have to pay approximately 30% of the sale price, in one way or another, back for a development fee in addition to any assessments we get hit with. Now I ask you is that going to leave us anything to replace our homes let alone a 5-acre ranchette. No! I don't begrudge the people who need homes a place to live, but I do resent having to give up my home for other. If this project were handled properly and financed adequately, this would not be the case. I see no reason if this valley has to be developed, why some sort of compromise that would meet the needs of all involved could not be reached. However, that would leave the financial burden on LAS POSITAS LAND CO. and they don't want that. Put the financial burden

# MASONIC HOMES of CALIFORNIA

California Masonic Memorial Temple  
1111 California Street, San Francisco, California 94108

Office of the  
Secretary

Telephone  
(415) 776 7000

April 12, 1983

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, California 94544

Attention William H. Fraley, Planning Director

Dear Mr. Fraley:

Re: Meeting with Property Owners  
Las Positas Area  
General Plan Amendment and Rezoning  
Consideration

Masonic Homes of California is an owner of a portion of the land described in the rezoning consideration for the Las Positas Area.

I regret that it is not possible for me to be at this meeting at 7:00 P.M. on Thursday, April 14th. Because the development of this property is in the interest of developing more housing for the area and because Masonic Homes of California owns a portion of the land, we would favor the scheduled development of the area.

Very truly yours,

BOARD OF TRUSTEES  
MASONIC HOMES OF CALIFORNIA

*Chester R. MacPhee*

Chester R. MacPhee, Trustee  
and Chairman Real Estate Committee



BAY AREA RAPID TRANSIT DISTRICT  
800 Madison Street  
Oakland, California 94607  
Telephone (415) 465-4100

April 12, 1983

ROBERT S. ALLEN  
PRESIDENT  
JOHN H. KIRKWOOD  
VICE PRESIDENT  
JULIUS H. BENTLEY  
GENERAL MANAGER  
Mr. William H. Fraley  
Planning Director  
Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

Re: Draft EIR: Las Positas General Plan Amendment Consideration  
(a revision of June 1982 DEIR)

DIRECTORS

Dear Bill:

HARLEY SIMMONS  
DIRECTOR

NELLO DIAMOND  
DIRECTOR

ARTHUR J. SHARLES  
DIRECTOR

MARGARET K. PEYOR  
DIRECTOR

ROBERT S. ALLEN  
DIRECTOR

JOHN GLENN  
DIRECTOR

WILFRED E. GUSBY  
DIRECTOR

EUGENE CARLINI  
DIRECTOR

JOHN H. KIRKWOOD  
DIRECTOR

As a follow-up to our initial letter of July 15, 1982, I would like to inform you that BART recently began the Livermore-Pleasanton BART extension Update Study which is re-examining the 1976 LPX Study. Alternatives under investigation will consider a possible Extension to Las Positas. The study is scheduled for completion this fall.

If you have any questions on the proposed BART extensions, please contact Dick Wenzel of my staff at 465-4100 extension 507.

Sincerely,

*Howard L. Goode*  
Howard L. Goode  
Department Manager  
Planning and Analysis

HLG:ah

cc: B. Neustadter  
D. Wenzel

CRM:lmh

RECEIVED  
CALIFORNIA WATER SERVICE COMPANY  
1780 North First Street  
1983 APR 12 PM 1:09 P. O. Box 1150 • San Jose, CA 95108 • (408) 298-1414

ALAMEDA COUNTY PLANNING  
DEPARTMENT

April 7, 1983

Alameda County Planning Department  
399 Elmhurst Street  
Hayward, CA 94544

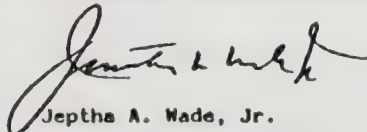
Gentlemen:

We have been furnished a copy of the Draft Environmental Impact Report for General Plan Amendment and Rezoning Considerations for the proposed new Town of Las Positas. On pages 5-93 and 5-94, reference is made to the provision of water utility service to this development. The report indicates that in the opinion of the author, it would not be convenient for California Water Service Company to provide utility service to the proposed development.

Without commenting on the author's reasons, we wish to advise that California Water Service Company has not been consulted at this time with regard to the problems involved in furnishing water service to the potential development but that we are willing to explore with the developers the possibility of such service.

Very truly yours,

CALIFORNIA WATER SERVICE COMPANY



Jephtha A. Wade, Jr.  
Vice President and Chief Engineer

JAW:vip

cc: B. Webster, LIV  
NB File



(916) 845-9890

APR 08 1983

Mr. Mun J. Mar  
General Manager  
Alameda County Flood Control and Water  
Conservation District, Zone 7  
1404 Conannon Boulevard  
Livermore, CA 94555

Dear Mun:

During our conversation on March 30, 1983 you requested confirmation of my explanation of the significance of Column (5) in Tables 3 through 6 of Bulletin 132-82.

These tables were included in the Bulletin to show what each agency's delivery would be with various levels of water supply in comparison to the present Table A entitlement and other estimates of demand. The amount shown in column (5) would be the Agency's entitlement in the event the State is unable to construct sufficient additional conservation facilities to prevent a reduction in the minimum project yield, or if for any other reason there is a reduction in the minimum project yield and entitlements are reduced pursuant to Article 18(b) in the Water Supply Contract.

Columns (6), (7), and (8) of these Tables show the delivery capability expected according to whether the water year is dry, average, or wet based on Column (5), but not exceeding the lesser of either column (2) or (4) except when surplus water is involved. The total annual available water supply will be allocated for delivery to the extent it is requested even though the total of reduced entitlements may be less.

I would like to stress that to my knowledge no permanent shortages, necessitating a reduction in entitlements, are presently anticipated and we expect to meet delivery requests consistent with the provisions of the Water Supply Contract, availability of facilities, and water supply.

Please feel free to call me should you have any further questions.

Sincerely,

Laurene E. Swenson, Chief  
State Water Project Analysts Office

RECEIVED  
APR 11 1983  
ZONE 7 ACFC&WCD



WATER AMOUNTS  
Million Acre-Foot/Yr.

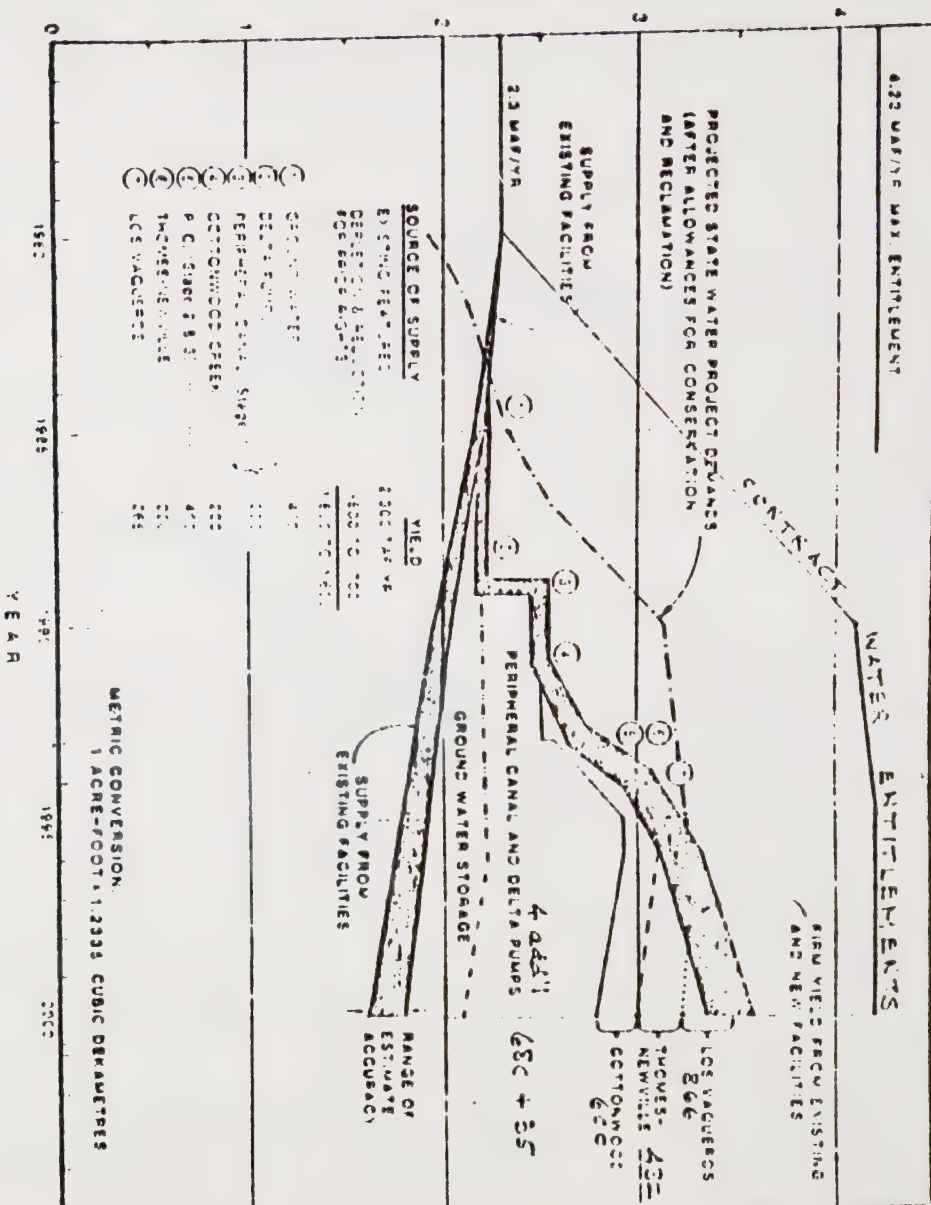


Figure 8. STAGING OF DELTA FACILITIES  
AND ADDITIONAL CONSERVATION FACILITIES

1981 COSTS  
in million \$

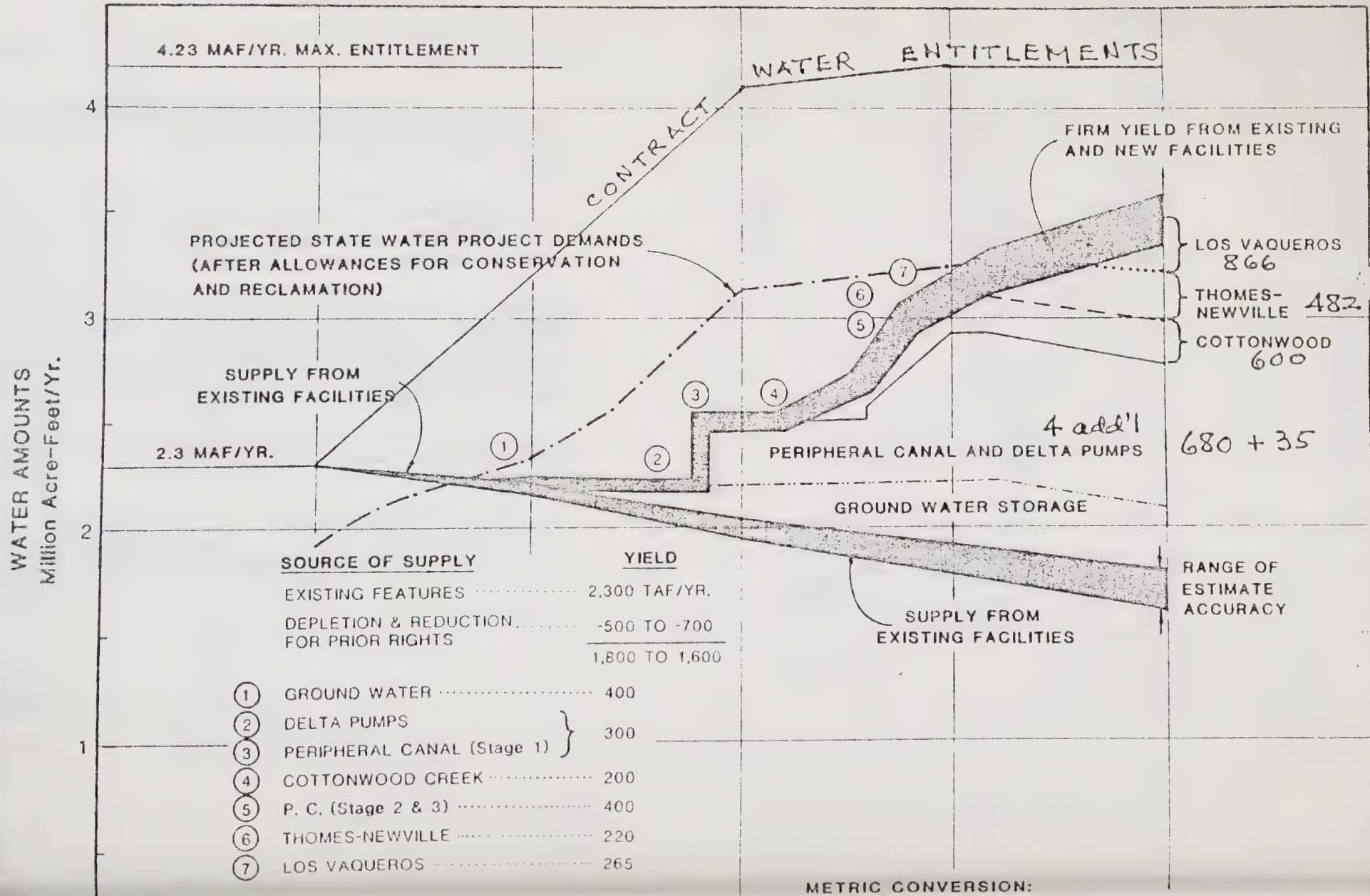


TABLE 3. ESTIMATED DELIVERY CAPABILITY YEAR 1990

AGENCY NAME	TABLE A ENTITLEMENT	CONSERVATION ENTITLEMENT	RECLAMATION ENTITLEMENT	TOTAL ENTITLEMENT	DELIVERY CAPABILITY YEAR 1990	DELIVERY CAPABILITY YEAR 1990		
						CLASSIFICATION: 1. A. B. C. D. E. F. G. H. I. J. K. L. M. N. O. P. Q. R. S. T. U. V. W. X. Y. Z. AA. AB. AC. AD. AE. AF. AG. AH. AI. AJ. AK. AL. AM. AN. AO. AP. AQ. AR. AS. AT. AU. AV. AW. AX. AY. AZ. BA. BB. BC. BD. BE. BF. BG. BH. BI. BJ. BK. BL. BM. BN. BO. BP. BQ. BR. BS. BT. BU. BV. BW. BX. BY. BZ. CA. CB. CC. CD. CE. CF. CG. CH. CI. CJ. CK. CL. CM. CN. CO. CP. CQ. CR. CS. CT. CU. CV. CW. CX. CY. CZ. DA. DB. DC. DD. DE. DF. DG. DH. DI. DJ. DK. DL. DM. DN. DO. DP. DQ. DR. DS. DT. DU. DV. DW. DX. DY. DZ. EA. EB. EC. ED. EE. EF. EG. EH. EI. EJ. EK. EL. EM. EN. EO. EP. EQ. ER. ES. ET. EU. EV. EW. EX. EY. EZ. FA. FB. FC. FD. FE. FF. FG. FH. FI. FJ. FK. FL. FM. FN. FO. FP. FQ. FR. FS. FT. FU. FV. FW. FX. FY. FZ. GA. GB. GC. GD. GE. GF. GG. GH. GI. GJ. GK. GL. GM. GN. GO. GP. GQ. GR. GS. GT. GU. GV. GW. GX. GY. GZ. HA. HB. HC. HD. HE. HF. HG. HH. HI. HJ. HK. HL. HM. HN. HO. HP. HQ. HR. HS. HT. HU. HV. HW. HX. HY. HZ. IA. IB. IC. ID. IE. IF. IG. IH. II. IJ. IK. IL. IM. IN. IO. IP. IQ. IR. IS. IT. IU. IV. IW. IX. IY. IZ. JA. JB. JC. JD. JE. JF. JG. JH. JI. JJ. JK. JL. JM. JN. JO. JP. JQ. JR. JS. JT. JU. JV. JW. JX. JY. JZ. KA. KB. KC. KD. KE. KF. KG. KH. KI. KJ. KK. KL. KM. KN. KO. KP. KQ. KR. KS. KT. KU. KV. KW. KX. KY. KZ. LA. LB. LC. LD. LE. LF. LG. LH. LI. LJ. LK. LL. LM. LN. LO. LP. LQ. LR. LS. LT. LU. LV. LW. LX. LY. LZ. MA. MB. MC. MD. ME. MF. MG. MH. MI. MJ. MK. ML. MM. MN. MO. MP. MQ. MR. MS. MT. MU. MV. MW. MX. MY. MZ. NA. NB. NC. ND. NE. NF. NG. NH. NI. NJ. NK. NL. NM. NO. NP. NQ. NR. NS. NT. NU. NV. NW. NX. NY. NZ. OA. OB. OC. OD. OE. OF. OG. OH. OI. OJ. OK. OL. OM. ON. OO. OP. OQ. OR. OS. OT. OU. OV. OW. OX. OY. OZ. PA. PB. PC. PD. PE. PF. PG. PH. PI. PJ. PK. PL. PM. PN. PO. PP. PQ. PR. PS. PT. PU. PV. PW. PX. PY. PZ. QA. QB. QC. QD. QE. QF. QG. QH. QI. QJ. QK. QL. QM. QN. QO. QP. QQ. QR. QS. QT. QU. QV. QW. QX. QY. QZ. RA. RB. RC. RD. RE. RF. RG. RH. RI. RJ. RK. RL. RM. RN. RO. RP. RQ. RR. RS. RT. RU. RV. RW. RX. RY. RZ. SA. SB. SC. SD. SE. SF. SG. SH. SI. SJ. SK. SL. SM. SN. SO. SP. SQ. SR. SS. ST. SU. SV. SW. SX. SY. SZ. TA. TB. TC. TD. TE. TF. TG. TH. TI. TJ. TK. TL. TM. TN. TO. TP. TQ. TR. TS. TT. TU. TV. TW. TX. TY. TZ. UA. UB. UC. UD. UE. UF. UG. UH. UI. UJ. UK. UL. UM. UN. UO. UP. UQ. UR. US. UT. UY. UZ. VA. VB. VC. VD. VE. VF. VG. VH. VI. VJ. VK. VL. VM. VN. VO. VP. VQ. VR. VS. VT. VU. VV. VW. VX. VY. VZ. WA. WB. WC. WD. WE. WF. WG. WH. WI. WJ. WK. WL. WM. WN. WO. WP. WQ. WR. WS. WT. WU. WV. WW. WX. WY. WZ. XA. XB. XC. XD. XE. XF. XG. XH. XI. XJ. XK. XL. XM. XN. XO. XP. XQ. XR. XS. XT. XU. XV. XW. XX. XY. XZ. YA. YB. YC. YD. YE. YF. YG. YH. YI. YJ. YK. YL. YM. YN. YO. YP. YQ. YR. YS. YT. YU. YV. YW. YX. YY. YZ. ZA. ZB. ZC. ZD. ZE. ZF. ZG. ZH. ZI. ZJ. ZK. ZL. ZM. ZN. ZO. ZP. ZQ. ZR. ZS. ZT. ZU. ZV. ZW. ZX. ZY. ZZ.		
						1990	1991	1992
SACRAMENTO RIVER AREA								
City of Yuba City	1,706	1,500	-	1,700	-	1,465	1,500	1,500
County of Butte	1,200	1,200	-	1,200	-	1,034	1,200	1,200
Plumas County	-	-	-	-	-	-	-	-
Subtotal	2,906	2,700	-	2,900	-	2,499	2,700	2,700
FACILITY AREA								
Yuba County	15,750	4,500	-	15,750	-	4,500	4,500	4,500
Sutro County	15,750	15,750	-	15,750	-	15,750	15,750	15,750
Subtotal	31,500	18,570	-	31,500	-	15,750	15,750	15,750
SACRAMENTO RIVER AREA								
Alameda County	27,000	27,000	-	27,000	-	27,000	27,000	27,000
Alameda County	30,800	30,800	11,200	30,800	-	26,539	26,539	26,539
Water District	88,000	88,000	19,200	88,000	-	75,826	75,826	75,826
Subtotal	145,800	145,800	11,200	145,800	-	129,365	129,365	129,365
SACRAMENTO RIVER AREA								
Devil's Den WD	12,700	12,700	7,300	12,700	-	10,943	10,943	10,943
Devil's Den WD	47,200	47,200	41,700	47,200	-	45,673	45,673	45,673
Devil's Den WD	3,000	3,000	1,000	3,000	-	2,500	2,500	2,500
Devil's Den WD	821,100	821,100	454,158	821,100	-	726,117	726,117	726,117
Devil's Den WD	93,900	79,550	-	93,900	-	81,150	81,150	81,150
Devil's Den WD	3,400	3,400	-	3,400	-	2,900	2,900	2,900
Devil's Den WD	4,900	4,900	3,600	4,900	-	4,223	4,223	4,223
Devil's Den WD	92,900	81,300	154,339	92,900	-	81,150	81,150	81,150
Subtotal	1,079,100	1,079,100	663,397	1,079,100	-	947,844	947,844	947,844
SACRAMENTO RIVER AREA								
Antelope Valley-	100,400	53,815	-	100,400	-	53,815	53,815	53,815
Antelope Valley-	29,100	13,000	-	29,100	-	13,000	13,000	13,000
Antelope Valley-	16,989	16,989	-	16,989	-	16,989	16,989	16,989
Antelope Valley-	4,350	2,805	-	4,350	-	2,805	2,805	2,805
Antelope Valley-	27,000	27,000	-	27,000	-	27,000	27,000	27,000
Antelope Valley-	1,730	1,730	240	1,730	-	1,491	1,491	1,491
Antelope Valley-	39,000	-	-	39,000	-	-	-	-
Antelope Valley-	14,180	4,750	-	14,180	-	4,750	4,750	4,750
Antelope Valley-	81,500	81,500	-	81,500	-	81,500	81,500	81,500
Antelope Valley-	21,800	18,500	-	21,800	-	18,500	18,500	18,500
Antelope Valley-	11,800	-	-	11,800	-	-	-	-
Antelope Valley-	1,558,700	1,232,711	-	1,558,700	-	1,232,711	1,232,711	1,232,711
Antelope Valley-	6,000	-	-	6,000	-	-	-	-
Subtotal	1,912,549	1,452,800	240	1,912,549	-	1,452,800	1,452,800	1,452,800
SACRAMENTO RIVER AREA								
AND WATER FILL	-	-	-	-	-	100,000	100,000	100,000
LOCATED	-	-	-	-	-	-	-	-
TOTAL	3,173,959	2,649,830	693,837	3,173,959	-	2,400,000	2,400,000	2,400,000

Convert water volumes to cubic kilometers, multiply acre-feet by 1.2335.

Central Coastal Area contractors not shown because data for extension of Central Branch is not final.

Maximum contractor entitlement requests; i.e., not adjusted for conservation and reclamation goals.

Projected Entitlement Limits are based on applying conservation and reclamation goals in Project Service Areas (see Bulletin No. 76). The goals attainable by contractors are being evaluated as part of the Water Management Planning Program with completion scheduled for June, 1994.

Minimum Annual Entitlements are Table A Annual Entitlements multiplied by the ratio of 1985 Minimum Project Yield (2.3 MAF) to Ultimate Minimum Project Yield (4.33 MAF).

Where applicable, conservation and reclamation goals have been reflected in allocating Municipal and Industrial water (see Bulletin No. 76).

Water delivery capabilities are less than the smaller of contractor entitlement request or projected entitlement limit.

Year deliveries based on maximum sequence of water year 1990 (the lowest year in the 10-year record); average year deliveries on water year 1991; the year deliveries on water year 1991 (the water year in the 10-year record).

Water basin management for additional Minimum Project Yield (see Bulletin No. 76).



TABLE 4: ESTIMATED DELIVERY CAPABILITY YEAR 1990  
(in acre-feet)<sup>1,2</sup>

AGENCY NAME	TABLE A ENTITLEMENT	CONTRACTOR ENTITLEMENT REQUEST	CONTRACTOR SURPLUS REQUEST	PROJECTED ENTITLEMENT DEMAND	REDUCED ENTITLEMENT BASED ON REDUCED MINIMUM PROJECT YIELD	DELIVERY CAPABILITY <sup>(3)</sup>		
						CLASSIFICATION OF WATER YEAR		
						DRY	AVERAGE	WET
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<u>Central River Area</u>								
City of Yuba City	3,800	3,800	-	3,800	1,887	2,123	2,773	
County of Butte	1,200	1,200	-	1,200	596	669	876	
Plumas County								
FC&WD	1,040	1,040	-	1,040	516	580	759	
Subtotal	6,040	6,040	-	6,040	2,999	3,372	4,408	
<u>North Bay Area</u>								
Yuba County								
FC&WD	25,000	5,600	-	8,250	12,411	5,600	5,600	
Solano County								
FC&WD	42,000	42,000	-	21,900	20,851	21,900	21,900	
Subtotal	67,000	47,600	-	30,150	33,262	27,500	27,500	
<u>Delta Region</u>								
Alameda County								
FC&WD, Zone 7	32,000	32,000	-	25,600	15,887	17,879	23,363	
Water District								
Delta Delta Valley	36,900	36,900	5,100	35,700	18,319	20,617	26,940	
Water District								
	92,000	92,000	15,100	79,000	45,674	51,403	67,168	
Subtotal	160,900	160,900	20,100	140,300	79,880	89,899	117,471	
<u>San Joaquin Valley Area</u>								
Devil's Den WD	12,700	12,700	7,300	12,700	6,305	7,095	9,272	
Shirley Ridge WD	57,700	57,700	27,100	57,700	28,645	32,241	42,126	
Empire West Side ID	3,000	3,000	3,000	3,000	1,489	1,677	2,191	
Yuba County WA - AG	1,033,800	1,339,000	119,400	1,019,000	513,214	580,513	758,541	
- M&I	119,600	114,400	-	97,700	54,376	63,924	83,542	
County of Kings	4,000	4,000	-	4,000	1,986	2,236	2,920	
Oak Flat WD	5,700	5,700	3,300	5,700	2,830	3,135	4,161	
Laurel Lake								
Basin WSD	118,500	118,500	108,500	118,500	58,830	66,209	86,535	
Subtotal	1,355,000	1,355,000	466,800	1,338,300	672,695	757,079	989,268	
<u>Southern California Area</u>								
Antelope Valley-								
East Kern WA	132,100	73,000	-	89,300	65,582	73,000	73,000	
Castaic Lake WA	39,300	16,000	-	14,700	19,511	14,700	14,700	
Coachella Valley								
Water District	23,100	23,100	-	20,500	11,468	12,906	16,864	
Crestline-Lake								
Arrowhead WA	5,800	4,000	-	5,400	2,879	3,240	4,000	
Desert Water Agency	38,100	38,100	-	36,300	18,915	21,287	27,816	
Littlerock Creek ID	2,300	2,300	270	2,200	1,142	1,284	1,679	
Mojave Water Agency	50,800	50,800	-	47,300	25,220	28,384	37,039	
Palmdale WD	17,300	8,000	-	9,600	8,589	8,000	8,000	
San Bernardino Valley								
Municipal WD	101,500	101,500	-	92,900	50,390	56,711	74,105	
San Gabriel Valley								
Municipal WD	28,400	18,500	-	26,400	14,298	16,091	18,500	
San Geronimo								
Pass WA	17,300	11,800	-	15,900	8,589	9,666	11,800	
The Metropolitan								
Water District of								
Southern California	2,011,500	1,358,800	-	1,170,800	998,617	1,123,881	1,170,800	
Ventura County								
Flood Control								
District	20,000	3,000	-	17,900	9,929	3,000	3,000	
Subtotal	2,487,900	1,708,900	270	1,549,200	1,235,129	1,372,150	1,461,353	
GROUND WATER FILL <sup>(4)</sup>	-	-	-	-	-	150,000	150,000	
TOTAL	4,076,840	3,278,440	487,170	3,063,990	2,023,965	2,400,000	2,750,000	

1. Convert water volumes to cubic dekametres, multiply acre-feet by 1.2335.
2. Central Coastal Area contractors not shown because date for extension of Coastal Branch is indefinite.
3. Estimated contractor entitlement requests, i.e., not adjusted for conservation and reclamation goals.
4. Entitlement Demands are based on applying conservation and reclamation goals in Project Management Planning program with completion scheduled for June, 1984.
5. Project Yield (0.1 MAF) to Ultimate Minimum Project Yield (4.03 MAF).
6. In applicable, conservation and reclamation goals have been reflected in allocating Municipal and Industrial water (see Footnote d).
7. Final delivery capabilities are less than the smaller of Contractor Entitlement Request or Estimated Entitlement Demand.
8. Dry Year deliveries based on recurring sequence of water year 1983 (8th driest year in 50-year record); Average Year deliveries on water year 1926; Wet Year deliveries on water year 1941 (6th wettest year in 50-year record).
9. Ground water basin management for additional Minimum Project Yield assumed in Southern California, only.

# TABLE 5. ESTIMATED DELIVERY CAPABILITY YEAR 1995

(in acre-feet)

AGENCY NAME	TABLE A ENTITLEMENT	CONTRACTOR ENTITLEMENT REQUEST	CONTRACTOR SURPLUS REQUEST	PROJECTED ENTITLEMENT DEMAND	REDUCED ENTITLE- MENT BASED ON REDUCED MINIMUM PROJECT YIELD	DELIVERY CAPABILITY		
						CLASSIFICATION OF WATER YEAR		
						DRY	AVERAGE	WET
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>Feather River Area</b>								
City of Yuba City	9,600	5,800	-	9,400	4,312			
County of Butte	27,500	27,500	-	25,400	12,352	5,128	5,800	5,800
Plumas County						14,691	18,730	21,000
FUSWCD	<u>1,250</u>	<u>1,250</u>	<u>-</u>	<u>1,100</u>	<u>501</u>	<u>668</u>	<u>954</u>	<u>1,100</u>
Subtotal	36,350	34,550	-	34,900	17,225	20,487	25,514	32,900
<b>Yuba River Area</b>								
Sapa County								
FUSWCD	25,000	9,900	-	9,600	11,229	9,500	9,500	9,500
Sutro County	<u>12,000</u>	<u>92,000</u>	<u>-</u>	<u>19,000</u>	<u>18,865</u>	<u>19,200</u>	<u>19,200</u>	<u>19,200</u>
Subtotal	67,000	111,900	-	29,400	30,094	28,700	28,700	28,700
<b>San Joaquin Area</b>								
Alameda County								
FUSWCD, Zone 7	62,000	42,000	-	41,000	18,865	22,437	28,654	31,500
Alameda County								
Water District	42,000	42,000	-	40,600	18,865	22,437	28,654	30,000
Santa Clara Valley								
Water District	<u>100,000</u>	<u>100,000</u>	<u>15,000</u>	<u>85,000</u>	<u>44,917</u>	<u>53,422</u>	<u>63,289</u>	<u>65,000</u>
Subtotal	184,000	184,000	15,000	157,100	82,647	98,296	125,597	127,500
<b>San Joaquin Valley Area</b>								
Will's Den WD	12,700	12,700	7,300	12,700	5,704	6,785	8,673	14,119
Colton Ridge WD	57,700	57,700	27,300	57,700	25,917	30,824	31,402	64,141
Empire West Side ID	3,000	3,000	3,000	3,000	1,348	1,602	2,048	7,000
Kern County WA - AG	1,033,800	1,039,000	119,400	1,039,000	464,355	559,214	714,815	1,157,127
- M&I	119,500	114,400	-	93,100	41,721	56,952	72,815	94,000
County of Kings	4,000	4,000	-	4,000	1,797	2,137	7,231	3,000
Oak Flat WD	5,700	5,700	1,300	5,700	2,560	3,046	3,891	9,000
Tulare Lake								
Basin WSD	<u>118,500</u>	<u>118,500</u>	<u>108,500</u>	<u>118,500</u>	<u>53,227</u>	<u>63,305</u>	<u>80,923</u>	<u>141,124</u>
Subtotal	1,355,000	1,355,000	466,800	1,333,700	608,629	723,865	925,298	1,450,550
<b>Southern California Area</b>								
Antelope Valley-								
East Kern WA	118,600	88,000	-	95,115	62,165	73,936	88,000	88,000
Antelope Lake WA	41,500	19,000	-	16,700	18,641	16,700	16,700	16,700
Coachella Valley								
Water District	23,100	23,100	-	19,400	10,176	12,340	15,775	19,400
Crestline-Lake								
Arrowhead WA	5,800	4,300	-	5,250	2,605	3,099	3,961	4,300
Desert Water Agency	38,100	38,100	-	35,600	17,113	20,353	26,017	35,600
Little Rock Creek ID	2,300	2,300	270	2,150	1,033	1,229	1,570	2,150
MoJave Water Agency	50,800	50,800	-	46,300	22,818	27,138	34,690	46,300
Palmdale WD	17,300	12,000	-	16,400	7,771	9,242	11,814	12,000
San Bernardino Valley								
Municipal WD	102,500	102,000	-	90,200	46,085	54,810	70,063	90,200
San Gabriel Valley								
Municipal WD	28,800	19,900	-	25,400	12,936	15,386	19,667	19,900
San Geronimo								
Pass WA	17,300	17,300	-	16,000	7,771	9,242	11,814	16,000
The Metropolitan								
Water District of								
Southern California	2,011,500	1,593,800	-	1,134,300	903,510	1,074,577	1,414,360	1,134,300
Ventura County								
Flood Control								
District	<u>20,000</u>	<u>10,000</u>	<u>-</u>	<u>12,450</u>	<u>8,983</u>	<u>10,000</u>	<u>10,000</u>	<u>10,000</u>
Subtotal	2,497,500	1,981,200	270	1,515,685	1,121,807	1,328,052	1,444,371	1,494,850
<b>GROUND WATER FILL</b>								
	-	-	-	-	-	200,000	200,000	200,000
<b>TOTAL</b>	<b>4,141,850</b>	<b>3,606,650</b>	<b>482,070</b>	<b>3,073,685</b>	<b>1,860,402</b>	<b>2,400,000</b>	<b>2,790,600</b>	<b>3,460,650</b>

- To convert water volumes to cubic dekameters, multiply acre-feet by 1.2335.
- Central Coastal Area contractors not shown because data for extension of Coastal Branch is indefinite.
- Unadjusted contractor entitlement requests; i.e., not adjusted for conservation and reclamation goals.
- Projected Entitlement Demands are based on applying conservation and reclamation goals in Project Service Areas (see Bulletin No. 16). The goals attainable by contractors are being evaluated as part of the Water Management Planning program with completion scheduled for June, 1994.
- Reduced Annual Entitlements are Table A Annual entitlements multiplied by ratio of 1990 Minimum Project Yield (1.8 MAF) to Ultimate Minimum Project Yield (4.73 MAF).
- Where applicable, conservation and reclamation goals have been reflected in allocating Municipal and Industrial water (see Footnote d).
- Shaded delivery capabilities are less than the smaller of Contractor Entitlement Request or Projected Entitlement Demand.
- Any Year Deliveries based on recurring sequence of water year 1989 (4th lowest year in 50-year record); Average Year Deliveries on water year 1985; Wet Year Deliveries on water year 1941 (6th wettest year in 50-year record).
- Ground water basin management for additional Minimum Project field assumed in Southern California, only.





IV.

MINUTES OF THE PLANNING COMMISSION HEARING ON THE LAS POSITAS  
GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS, AND  
ENVIRONMENTAL IMPACT REPORT, December 20, 1983 through  
September 19, 1983



M I N U T E S  
OF  
THE COUNTY PLANNING COMMISSION OF ALAMEDA COUNTY

The December 6, 1982, meeting of the Alameda County Planning Commission was held at 1:30 p.m. in the Auditorium of the Public Works Building, 399 Elmhurst Street, Hayward, California.

The following Commissioners were present:

Commissioner Shockley  
Commissioner Tully  
Commissioner Sutherland  
Commissioner Douglas  
Commissioner Bernhardt  
Commissioner Warren

Commissioner Spiliotopoulos was excused.

OTHERS PRESENT:

William H. Fraley, Planning Director  
Betty Croly, Assistant Planning Director  
Adolph Martinelli, Senior Planner  
Bill Allin, Planner  
Paul Deutsch, Planner  
Georgia Rubiolo, Recording Secretary

The meeting was called to order by Chairman Tully.

1. 1532ND UNIT - ALLAN BROHARD - Petition to reclassify one parcel containing approximately 19,890 square feet (0.46 acres) from the C-1-S (Retail Business, Sign Control) District, located at 20478 Anita Avenue, east side, approximately 350 feet north of the intersection with Castro Valley Boulevard, Castro Valley, bearing County Assessor's designation 84A-128-5.

~~Chairman Tully~~ advised that the applicant has withdrawn his application.

2. Approval of Minutes of November 15, 1982 -

Commissioner Shockley moved approval as submitted.

Seconded by Commissioner Warren and carried.

3. 1521ST ZONING UNIT - LAS POSITAS GENERAL PLAN AMENDMENT CONSIDERATION AND ENVIRONMENTAL IMPACT REPORT

Mr. Allin noted that the staff has additional information for today. He recommended that the Commission take testimony, and offered to answer any questions. He recommended that the Commission continue the matter to December 20, 1982.

Commissioner Douglas asked what material has been received from Angus McDonald and Associates concerning the financial analysis.

Mr. Allin replied that the staff has received some preliminary material relating to the financial review. They are being offered by the Planning Staff and LAFCO and the County Administrator's Office and Angus McDonald is now in the process of preparing revisions to the material.

Mr. Fraley advised that the draft material are working papers. A final paper is scheduled for submittal on December 17th. He said that if the financial report is not submitted prior to December 20, the matter will be continued from that date.



3. 1521ST ZONING UNIT (CONTINUED):

Mr. Tom Curry, City Attorney of the City of Livermore introduced Ms. Alletta D'A. Belin as legal counsel representing the City of Livermore.

Ms. D'A. Belin, of the law firm of Shute, Mihaley and Weinberger advised that her firm has been retained by the City of Livermore in connection with the City's involvement in Las Positas. She indicated that the City has submitted substantial written comment on the EIR and she would add two general points.

With regard to recirculation of the draft EIR, the County responses to comment indicate that there will be substantial changes and revisions to the draft EIR and the staff comment today indicates that the EIR is incomplete. She said that the law is clear that the EIR should be circulated after it is complete and if the responses to the comments and other additions by the County produce important additions and revisions to the EIR it must be recirculated so that public agencies and the public has an opportunity to comment on it. She said this is clearly required by CEQA. She said it is impossible to comment adequately and have input on the project until those reports are made available.

Ms. D'A. Belin added that another deficiency is the lack of any analysis of the cumulative impacts of the project. The most significant environmental impacts must be viewed on a regional basis and this project must be looked at in the context of other projects; it is critical that the EIR look at that issue.

She said that as to the substance of the EIR she would point out the project is not in accord with the policies of virtually every governmental agency that has jurisdiction over this project and has applicable policies. That would indicate some very fundamental problems with the project itself, not just the report.

Mr. Fraley asked if Ms. D'A. Belin could state her definition of "regional" as relates to this project.

Ms. D'A. Belin said she is not prepared to define what a region would be but it would vary with relation to various concerns such as air and water or the particular concern. She said that there are other developments such as North Bluff and Hacienda Park which have significant impacts and should be considered together with Las Positas.

Mr. Tom Lindenmeyer of the East Bay Regional Park District was concerned that District be given the opportunity to respond to the staff response to their comments on the EIR.

Mr. Allin advised that the response will be forwarded to the East Bay Regional Park District and communication has already been directed to that end.

Commissioner Shockley asked when the decision will be made as to whether or not there will be a recirculation of the DEIR.

Mr. Fraley advised that the decision would be made possibly at the end of this week and will have to be based on an assessment of the total material coming from the financial consultant. He said that if the reconstituted document must be recirculated as a draft it would require a 30 to 45 day period for recirculation.

Commissioner Douglas asked if the determination regarding the recirculation is based on staff determination or based on legal advice.

Mr. Fraley said it is both and it is a value judgement. He said that in any event the completed document cannot be available before the last week in January.

3. 1521ST ZONING UNIT (CONTINUED):

Commissioner Shockley asked if the recirculation question will be a recommendation to the Planning Commission.

Mr. Fraley advised that the Commission must certify that they find the document adequate before they make a recommendation on the Plan Amendment and Rezoning.

Commissioner Shockley moved continuance to December 20, 1982, at 1:30 p.m.

Seconded by Commissioner Warren and carried.

4. 1521ST ZONING UNIT - APPLICATION OF LAS POSITAS LAND COMPANY as expanded by the Alameda County Planning Commission, for reclassification from the A (Agriculture) District to the PD (Planned Development) District to allow uses and regulations as specified by the Las Positas General Plan Amendment Consideration, upon its adoption, of 76 parcels containing approximately 4,417 acres bounded generally by Interstate 580 on the south, Collier Canyon Road on the west, Contra Costa County on the north and North Vasco Road on the east, northerly of Livermore, unincorporated Alameda County.

Commissioner Shockley moved continuance to December 20, 1982, at 1:30 p.m.

Seconded by Commissioner Warren and carried.

5. REYNOLD C. JOHNSON PLAN AMENDMENT AND RECLASSIFICATION REQUEST, Public hearing on requests for General Plan Amendment and reclassification, 1525th Zoning Unit, to allow development of an industrial park on a 197 acre property located at the southeast quadrant of the intersection of El Charro Road and I-580 Freeway, between Pleasanton and Livermore, unincorporated Alameda County.

Mr. Martinelli presented the staff report. He advised that the draft was distributed on November 9 and has to be continued to permit completion of the review period.

Commissioner Shockley asked that the record show that the EIR was not distributed to members of the Planning Commission until December 6, 1982.

Mr. Martinelli advised that the area has been expanded to include a  $\pm 3$  acre parcel owned by Moldts and that parcel would be affected by realignment of roads and commercial and industrial uses on the proposed land use and development plan.

He recommended that the Commission take testimony and continue the application until January 3, 1982, for a final EIR.

Mr. Bart Schennone, attorney representing the applicant, believed that this project is one that reflects the ability by this developer to develop a fine project. He said that the land is suited for the proposed use much more than its presently designated residential use.

Mr. Reynold Johnson, President of the Reynolds C. Johnson Company, described the background of his company and their present operation and said that this proposed project will include amenities such as those contained in Signature Park. He said that they maintain a pride in ownership posture and this development will be an asset to the County.

Mr. Jim Stark indicated that his firm is providing planning and engineering services for this project. He described the proposal for the 197 acre industrial park. He indicated that the commercial area is intended to service those employees generated by the industrial park and those of Staples Ranch. He described their efforts to comply with the Airport Land Use Guidelines. He said that the circulation pattern is feasible and noted that they are depending with Zone 7 and the State Department of Fish and Game and they should come back with a greater degree of habitation than is possible at this time.

M I N U T E S

OF

THE COUNTY PLANNING COMMISSION OF ALAMEDA COUNTY

The December 20, 1982, meeting of the Alameda County Planning Commission was held at 1:30 p.m., in the Auditorium of the Public Works Building, 399 Elmhurst Street, Hayward, California.

MEMBERS PRESENT:

Commissioner Paul Bernhardt  
Commissioner Shirley Douglas  
Commissioner Barbara Shockley  
Commissioner Sid Sutherland  
Commissioner Griffeth Tully  
Commissioner Mary Warren

MEMBERS ABSENT:

Commissioner George Spiliotopolous

OTHER PRESENT:

William H. Fraley, Planning Director  
Betty Croly, Assistant Planning Director  
Adolph Martinelli, Senior Planner  
James Sorensen, Planner III  
Dan Bell, Planner II  
Georgia Rubiolo, Recording Secretary

The meeting was called to order by Chairman Tully.

1. Approval of minutes of December 6, 1982.

It was moved by Commissioner Shockley; seconded by Commissioner Warren that the minutes be approved as submitted.

2. 1521ST ZONING UNIT - LAS POSITAS GENERAL PLAN AMENDMENT CONSIDERATION AND ENVIRONMENTAL IMPACT REPORT.

Mr. Fraley advised that the staff has reviewed the comments received from the Draft EIR and after considerable discussion has concluded that the changes are substantial and that the document should be recirculated.

He said that another Draft EIR will be circulated and it will include prior comments and intended answers to those comments so that the recipients will be able to quickly review the new aspects of the document. He recommended that the hearing be continued to February 7 at which time testimony can be taken on the project.

Commissioner Warren moved continuance to February 7, 1983.

Seconded by Commissioner Sutherland and carried.

3. 1521ST ZONING UNIT - APPLICATION OF LAS POSITAS LAND COMPANY as expanded by the Alameda County Planning Commission for reclassification from the A (Agriculture) District to the PD (Planned Development) District, to allow uses and regulations as specified by the Las Positas General Plan Amendment Consideration, upon its adoption, of 76 parcels containing approximately 4, acres bounded generally by Interstate 580 on the south, Collier Canyon Road on the west, Contra Costa County on the north and North Vasco Road on the e northerly of Livermore, unincorporated Alameda County (Continued from Decem 6, 1982).

Continued to February 7, 1983. For discussion see Item No. 2 above.



subdivisions circumventing legal procedures; and attempts to subdivide property illegally in a way contrary to the State Subdivision and Map Act.

Mr. Michael Terkel representing Mr. Zimmerman and the other owners advised that he received a variance from the Board of Supervisors and as a condition of that variance they had to apply for this rezoning. He said that they applied for five acre zoning as they thought that would be ideal. Their general idea is that they would like one building site per parcel of land. He said that if this is not approved the only thing left would be to get a variance for the other two parcels.

Mr. George Talaska said that the property should be subdivided into five acres but he would be satisfied to have one site per lot.

Commissioner Douglas said that this speaks to the same issue discussed under the previous application. She moved that the Commission adopt the staff recommendation.

Seconded by Commissioner Shockey. The motion failed with Commissioners Tully and Sutherland voting no. Commissioners Spiliotopoulos, Leonard and Bernhardt were absent.

Chairman Tully continued the matter to May 2, at 6 p.m. for further discussion by the Commission and a vote of the members absent.

Commissioner Sutherland asked if the City of Livermore could be in a position to review their policies and General Plan relating to residential and farm land policies.

Commissioner Douglas asked for more elaboration from the staff as to what they will end up with as far as legal implications from the County point of view.

Staff indicated that additional information would be forthcoming.

#### LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATION - 1521ST ZONING UNIT.

Chairman Tully announced that this is the first hearing on the amended draft EIR. He said that the Commission will hear the staff presentation and continue the hearing to April 25, 1983 at the Granada High School in Livermore. He advised that anyone desiring to speak tonight will be heard.

Mr. Bill Allin presented the staff report. He indicated the major changes in this document from the EIR that was sent out in June of 1982.

Mr. Jack Smith, attorney representing the proponents, was present and indicated that he had nothing to add at this time.

Mr. Tom Lindenmeyer of the East Bay Regional Park District, noted that as a biologist he would comment on the statement in the EIR relating to the habitat of the Kit Fox. He said it is not heavy brush; they live in widely scattered brush with sandy wash, and prefer open country not brushland. He referred to page 5-84 and said that the plan would have an adverse effect on the Regional Park District in that the demands for

capital improvements which would be occasioned by the development would not be compensated for by the additional tax revenues to the District because Las Positas is not in the District. He said that the impact report indicates no mitigation; he believed that the mitigation should be identified, which in this case that would be annexation to the EBRPD to which the project is adjacent. This would allow partial mitigation.

Mr. Fraley advised that the staff will hold a meeting with the property owners and Agencies to answer any technical questions prior to the continued public hearing at the Granada High School on April 25, 1983 at 7:00 p.m.

Commissioner Douglas moved continuance to April 25, 1983 at 7:00 p.m. in the Granada High School, Student Union Building, Livermore, CA.

Seconded by Commissioner Shockley and carried.

6. PUBLIC HEARING ON DRAFT UNINCORPORATED EDEN (PORTION) AREA PLAN.

Miss Croly recommended that the Commission resolve the issues and approve the draft plan, adopt the Negative Declaration and recommend to the Board of Supervisors that they hold public hearings and adopt the Plan. She said that at the last hearing several issues came up and the staff will review and make recommendations on those issues.

Ms. Leslie Robin, reviewed the issues contained in the staff report. She recommended that the Commission include as a policy that at the appropriate time the boundary of the unincorporated community be reassessed to determine if a boundary change is warranted. She reviewed the recommendations relating to land use density and noted that the Castro Vally MAC will meet with residents to further discuss the boundary issue, the meeting is scheduled for April 11, 1983.

Mr. Ray Burnham of Public Works reviewed recommendations relating to parking on public streets and the requirement of three parking spaces per unit in in-fill situations.

Ms. Mavilia Hanks, President of the Ashland Community Association, said that they would ask that the density be lowered because they feel the open space will be depleted if development occurs at the recommended density. She said that the area does not have a decent park in all of the community. Although they do have miniparks and linear parks it is not enough. She continued that they would also question why this Commission has not come to the people in the community. She requested that the members of the Commission come to the area being affected as many members of the community do not understand what the General Plan says for the future of their area. She said that even though representatives of the Association worked with the task study group, the community would like a chance to hear what is recommended for the general plan.

Ms. Jo Silva, referred to Fairmont Terrace and said that it is in the sphere of influence of San Leandro and is in the same service districts for fire, sewer and schools. She said that her property has been

MINUTES  
OF  
ALAMEDA COUNTY PLANNING COMMISSION  
SPECIAL MEETING

The April 25, 1983 meeting of the Alameda County Planning Commission was held at the hour of 7:00 p.m. in the Student Union of the Granada High School, 400 Wall Street, Livermore, CA.

MEMBERS PRESENT:

Griffeth Tully, Chairman  
Shirley Douglas  
William Leonard  
Barbara Shockly  
George Spiliotopoulos  
Sid Sutherland

MEMBERS ABSENT:

Paul Bernhardt

OTHERS PRESENT:

William H. Fraley, Planning Director  
Betty Croly, Assistant Planning Director  
William Allin, Planner III  
Paul Deutsch, Planner III  
Georgia Rubiolo, Recording Secretary

The meeting was called to order by Chairman Tully.

1. 1521st Zoning Unit - General Plan Amendment and Rezoning Consideration - Las Positas Area.

Chairman Tully announced that the Planning Staff would not make a presentation at this hearing and the developer has indicated that they would not make a presentation at this time. He indicated that the Commission would take testimony from the public and representatives of the City of Livermore and other public agencies. He said that the City has a City Council meeting tonight; therefore the Commission would take testimony from the City prior to other testimony.

Mayor Dale Turner of the City of Livermore presented the official position statement of the City of Livermore regarding the proposed Las Positas General Plan Amendment and rezoning. (A copy of his entire statement is on file).



Mr. John Stein a resident of Livermore spoke representing his own point of view. He said that he felt that the time for new towns such as Las Positas has come and gone. He said that Livermore had the opportunity to have their own new town, "Springtown", and that developer made promises and was unable to keep them.

Mr. Stein noted that failure of new towns cost the government \$250,000,000 in government loans and in 1968 they sponsored a study to find out why. He reviewed the findings of the study.

In regard to this project he stated that everyone is for local control unless it interferes with their control. He said that there are two weaknesses in this autocratic design: people don't want to be told what to do by people that they have no control over. He said that we have seen this in Dublin, San Ramon and Sunol. He said that new towns do not permit participation in government for at least two years.

He said that the majority of the housing proposed (85%) is considered affordable. He referred to the argument that Las Positas is needed to provide housing for employees that will be at the newly developed industrial areas of Dublin, San Ramon, and Pleasanton.

He said that the estimate is made on the data concerning workers of households of nearby communities and makes no allowances for single parents or seniors, people who need affordable housing.

Mr. Stein said that while the Angus MacDonald financial analysis is a vast improvement over the previous EIR, the one flaw is that it is based on cost estimates by Wilsey and Ham.

He asked why the sewerage treatment facility was reduced from \$43,000,000 to \$36,000,000, and why was the facility site reduced from \$600,000 to \$500,000. He said that there are other costs that have been changed with no justification that he could find.

Mr. Stein asked that the Commission consider the rest of the taxpayers in the community. He made reference to several HUD reports.

Commissioner Spiliotopoulos asked for copies of the material referred to by Mr. Stein. Mr. Stein indicated that he would mail a copy of the material to the Commission.

Mr. John Migloria, stated that he has no vested interest in the Las Positas area, but he is the owner of 60 acres on Tesla Road which he

contemplates putting into grapes with the Wente Brothers. He spoke in support of the project as he felt that new housing is necessary as young people can no longer afford to buy homes in the Valley. He noted that many of his co-workers must go out of Alameda County to afford housing.

Mr. Art Falting of 1018 Via Granada questioned the projections in the financial report. He noted costs shown in the projections for sewerage treatment for years 1, year 5 through 10 and year 15. He reviewed the projected costs.

He felt that this is contrary to experience. He also noted that the unincorporated developed areas, other than the City of Dublin, have been a drain on the tax payers of Alameda County. He said that it looks like Las Positas, if developed, might never break even. He referred to schools and said that even though there were three Livermore schools closed they would have to be closed even if Las Positas were developed primarily because they are not in a location where the people living in that area could get to. He discussed the current practice of busing children from the rural areas and the possibility of obtaining funds for new schools. He noted that even if there are funds the schools will not be built until the students are already there. He said that in any case you are looking about 4 years before the students will be adequately financed and maintained in that community. He felt this should be a consideration in determining whether this is a feasible proposal.

He said that it behooves the Commission, as the representatives of the community, to see that when that first student arrives there is a school for him to go to in an area that he can reasonably get to.

He noted that Livermore is a low wealth District and that additional costs would be necessitated due to this development which would infringe on the educational monies available for existing residents.

He also spoke of the cost of the export pipe line and didn't believe that the people here now and who are paying for the existing pipe line should be burdened further to pay for another.

Mr. Randy Stone, employed as a consulting geologist and serving as a member of the Zone 7 Board of Directors said that the Board has yet to consider the most recent transmittal so he would speak as an individual. He spoke of the number of acre feet of water that the total Valley demanded in 1980 and the projections for the year 2000, noting that in dry years this would be 1/6 of the water supply. He said that some water supply problems would occur particularly during periods of drought.

Mr. Stone said that he would concur in the statement in the EIR that total demand in the Zone 7 area including the project would exceed the projected supply in all cases: Zone 7 staff has pointed this out.

Mr. Stone said that water conservation practices result in a 20% savings in water but that this can't make up for the projected supply deficiency pointed out in the EIR. Greater use of ground water is not possible. When more water is furnished from the ground, the City of Pleasanton water quality decreases because the ground water quality is less than the sub-surface water quality. He said it would probably also affect Dublin's water quality.

The second undesirable effect that greater use of ground water would cause is more rapidly lowering of ground water levels. He said that the levels are rising right now but a number of things have happened to cause that.

The Department of Water Resources charges for water supplied have increased which means that Zone 7 wholesale water costs have more than doubled, so they are no longer recharging the ground water basin because of savings that accrue from not replacing the water in the ground. He said additional withdrawal would only hasten ground water depletion. He also said that waste water reuse would have serious deleterious effects. He also cautioned that with the present constraints the Valley would be doing well to provide for the existing planned growth in the Valley over the next 25 years.

Mr. Stone said that the second issue is land disposal of treated waste water. The plan proposals in his judgement are inadequate to protect the quality of surface and ground water in the Valley. He said that it runs counter to Zone 7 Wastewater Plan as approved by Zone 7 last year. He discussed the proposal in the most recent draft and said that such a system would be expensive to install and difficult to manage. He also noted that the system is so experimental that no estimate of costs appears in the EIR. He was of the opinion that it would be very difficult to use; he knew of no similar system and felt that the system would be experimental. He indicated that the Springtown area could be adversely affected by rising ground water levels. He felt that the Las Positas area is perhaps the worst area in the Livermore Valley for such waste water disposal. He said it is the wrong thing to do, particularly when you try to force water down an area where it is naturally trying to go to the surface. He read from the Zone 7 plan and noted the poor quality of groundwater in the area and said that any significant rise in the water table could force the water to migrate to the central groundwater basin. He said that this should be added to the list of unavoidable adverse impacts. He also felt that two other unavoidable impacts must be added: (1) Overcommitment of water supply and a possible shortage; and (2) degradation of ground water quality as well as increased drainage problems.

Ms. Susan Steinberg speaking as Chairman of the Livermore Committee for



Quality Education, said that their concern for the future of the educational services provided in this area has led them to strongly urge denial of the proposed Las Positas project. She spoke of the increasingly constricted annual budget and the crisis in education funding. (A copy of her statement is on file).

Ms. Margaret Tracy, President of PARC referred to forecasts of the State water supply as published by the Department of Water Resources. She reviewed graphs which indicate that the demand will not be met if it is a drought or average year in 1985. She submitted copies of the data to the Commission and said that there are a lot of unknowns relating to water supply and that should be a major factor in the decision of the Commission. She referred to page 5-97 of the EIR and noted that the demand for fire control isn't mentioned in the table. She questioned the figures relating to the actual demand for the planned 18,000 dwelling units, 103 acres of commercial, 543 acres of industrial and office and 430 office and institutional designated land uses.

Ms. Betty Carrell, President of the Board of Education of the Livermore Valley Joint Unified School District, read a prepared statement which said in part "it is still the position of the Board of Education that there must be a guarantee, prior to any approval of the Las Positas development, that adequate school facilities will be available when and where they are needed. The Board must be assured the construction of new schools in the development is accomplished in a manner that will avoid the overcrowding of existing schools and the potential reduction of the quality of education that overcrowding can cause." (A copy of her complete statement is on file).

Mr. Clarence Honig, resident of Tyler Avenue in Livermore spoke in opposition to the proposed development. He spoke of the projections relating to expenditures and noted that under the best possible case, by the end of 1990 there will be a deficit accruing to the County of \$772,000 and at the end of 1995 there will be a deficit of \$314,000. He submitted that the worst case would likely occur and asked how Las Positas can compete with the development of industrial and commercial developments in the City of Livermore.

He noted that Las Positas will be surrounded on the east, south and west by the Livermore City limits and on the north by Contra Costa County. He asked how this can become a viable community. He also spoke about his concern relating to the package sewer plant and asked if the County is to require a performance bond and what happens if the plant malfunctions. He said that the responsibility will have to rest with the County but the citizens must live in the Valley.

Mr. Honig referred to statements of Supervisor Cooper relating to the primary motivation for approving Las Positas. He said that they relate to the ABAG Housing quota based on demand. He said that if you look at what ABAG is saying, you find that this quota for the County is to be met by the municipalities in the County and if it cannot be, then and only then, is it to be met by the County developing the unincorporated areas. He also referred to the ABAG Plan which indicates that the development should occur within the confines of existing districts. He said if you use the ABAG quota as an excuse to override local plans, then you have to look at the plan as a whole.

Mr. Jack Campbell of 2136 Westbrook Lane, Livermore, said that Livermore has a general plan for the development of their community and it seems to work well. He said that their plans calls for a growth rate that allows them to use the public works they have and still maintain the quality of life that they enjoy. He said that although Las Positas does lie outside the Livermore City Limits, it is clearly within their influence. He felt that such development will disturb the plans that they have made for the growth of the town. He is for controlled growth and the rate of development proposed at Las Positas is too fast. He urged that the growth in the area be accomplished in a manner compatible with the Livermore General Plan.

Mr. Archer Futch, representing the Livermore Amador Valley Chapter of the Bay Area Sierra Club, said that the Sierra Club supports responsible growth within established communities in the Valley consistent with the environment. He spoke of Las Positas being incompatible with good land use planning. He also said that Las Positas is not the only major development proposed for the Valley and the cumulative effects and impacts of all developments have not been studied. He said an EIR should be prepared by the County which considers the cumulative effects of all development proposed in the Valley.

This development represents a new town in name only as it depends on adjacent communities for services and jobs. He said that approval of this application would be contrary to City, County and State goals. He indicated that based on published plans approved by all agencies, Livermore has expended over three-quarters of a million dollars on public works facilities to serve this area. It would be uneconomical and a waste of public funds to duplicate such services. He said that Las Positas could not be a self-sustaining community and said that county residents will in effect subsidize Las Positas.

Mr. Futch said that the Sierra Club urges the addition of either of the two financing methods to reduce the public subsidy. He noted that there has never been a project of this magnitude requiring the expenditure of so many public funds to ensure the success of a private development.



Mr. Futch spoke of groundwater quality and said that the proposed sewerage system is little understood by experts and poses a significant risk to the Valley's water supply. He said that export of effluent to San Francisco Bay should be required. He referred to expert testimony of Mr. Randy Stone which said that completion of the State Water project is doubtful. He suggested that the Plan amendment and Zoning consideration be delayed until such time as the State Water Study is completed. He said that the development is poorly planned, that it will result in a loss of open space, degradation of the ground water supply and a massive support of private development with public funds. He recommended denial of the development as proposed.

Mr. Larry Chesney, citizen of the City of Livermore, spoke in favor of the Las Positas Project. He said that based on the history of the City of Livermore he felt it is clear that the City will not develop the Las Positas Valley.

He spoke of the need of County planners to assure Valley residents that this will be a well balanced community and that the costs of development and services for the project will be primarily borne by the developer. Mr. Chesney said that the County must assure that the development will not advance faster than the services can be provided and that the environmental issues are taken care of. He believed that growth is essential to a well rounded community.

Ms. Valerie Raymond spoke in opposition to the proposed development. She said that over the years this project has been seeking approval from the County there has been a tendency on the part of the County to dismiss concerns that have been raised about the project as coming from "no growers" and therefore that those concerns are invalid. She referred to the problems in the Valley as a result of too rapid growth in the 1950's and 1960s. (A complete copy of her statement is on file).

Ms. Raymond said that she believes that the County should think very seriously about the problems with this project and the ability to deal with them before it plunges into something that has the potential to become a financial fiasco for Alameda County taxpayers. The fiduciary responsibility to the taxpayers requires no less.

Mr. Thornton Taylor of 1025 Xavier Way, addressed his remarks primarily to the Bel Roma residents. He said it is not right for anyone now living in Bel Roma to feel that they may have their home in the Las Positas Valley, but that no one else should move in. Furthermore, the Las Positas development is needed to furnish the homes for the many new people needed to fill the jobs being created by the industrial parks in the Valley. The



development itself will create many jobs and people are looking for jobs. He urged support and approval of the Las Positas General Plan Amendment. (A copy of his statement is on file.

Mr. Barton Stillman, from Sunol, spoke concerning the recent action of the Board of Supervisors approving the Rancho Sunol Development in Sunol. He said that the entire area of land use development has to do with one government problem. He said that he would like to see the Planning staff and Commission survey the people to determine their ideas and he had seen no survey made on any development proposal. He said that he and his group intend to form a committee of people in the unincorporated areas of Alameda County that will compel the County to listen to the people.

Ms. Gail Verdanega of 4681 Bel Roma Road said that she understood how Mr. Taylor was opposed to the Bel Roma Road residents coming in but it was not the same as the current proposal. She said that they are not opposed to Las Positas per se but they do not want to lose their lifestyle. She felt that some of the residents would be faced with the fact of losing their homes due to assessments.

Ms. Verdanega read a prepared statement which said in part "Las Positas Land Company is proposing a "new town" in the Las Positas Valley. This town is to be financed by County taxpayers and by the residents of New Town." She noted that the monthly water is to be \$12 and sewer fee is \$30 for a total of \$42 to start. She questioned whether this will be affordable housing. She also made reference to the price per acre in the Las Positas area and said that before a project of this magnitude is built, all landowners in the Valley should be apprised of the proposal and should be in agreement. If that is not the case, then the land company should own or have futures on 100% of the whole valley before the project could even be considered. (A copy of her statement is on file.)

Mr. Ed Taylor spoke in favor of the Las Positas Project. He said it would provide homes and jobs for people and the area has poor soil and farmers have not been able to make a profitable living in this area. He said that the City of Livermore has a no growth policy that would not permit this development. He felt this to be an excellent proposal that is well thought out. He urged approval.

Ms. Susan Coburn speaking as a Livermore resident, spoke in opposition to the proposal. She based this opposition on the financial burden that it would place on the County and existing residents. She expressed concern that the costs will be even greater than anticipated and that the developer might not complete the development as planned, therefore creating urban sprawl rather than a well planned community. She said that

cost effectiveness should be a prime consideration. She believed that Livermore, Pleasanton and Dublin can accommodate growth more efficiently. She urged rejection of the proposal.

Mr. Bill Thompson of Hartman Road, said he has a five acre parcel in the area but he is not concerned about assessments, because he didn't think that is going to happen. He said that he is in favor of the project and he doubted if the Livermore School District will turn down the money that will be generated to finance the schools for this development. He asked if Alameda County is going to set back and let Contra Costa County, Tracy, Manteca and San Joaquin County take all the growth just because there are certain people who want to stop growth.

Mr. David Eller, resident of Livermore spoke in opposition to the project. He was opposed to this development and said he does not want this Valley to turn into another San Fernando Valley and stagnate. Rather he wanted it to continue to grow at a natural pace. He spoke of the need for a regional approach to planning the Valley. He said that if the Planning Commission and Board of Supervisors really believe in planning they would urge a regional plan study before any further industrial park or housing projects are approved. He hoped that the cities in the Valley would cooperate with the County and the State. He said that another new town is proposed just on the other side of the Altamont, that has to have a financial study. He said it appears that proposal has the same problems that have been discussed in connection with this project. He urged consideration of the statements of the public and said that the County has no obligation to provide a profit for those that want to build on their property.

Ms. Pat Broadman of East Avenue, owner of property in the Las Positas Area urged support of the developer and the project.

Ms. Rosemarie Gleese, stated that she and her three sisters are owners of a 212 acre parcel of land in the Las Positas Valley. She described the history of their property. She urged approval of the project. (A copy of her complete statement is on file.)

Mr. John Quigley, resident of San Francisco, and property owner in the Las Positas area, said that the property cannot be farmed at a profit and if people want open space they should purchase the land. He urged approval of the project.

Mr. Richard Fagundes of Manning Road, said that 20 years ago he would have opposed this proposal but that agriculture is in such a state that it is a losing battle to try to hang on there, and there has to be some development to help the farmer and landowner out. He also pointed out that there is little wildlife left as the area really isn't "country" anymore.

Mr. Alvin Jensen of North Livermore Avenue, owner of 900 acres, 700 acres of which are involved in Net Town, called the Commission's attention to the letter that he had submitted previously and the letter submitted by L. Stanely and son. He spoke of the deficiencies of the City of Livermore and their disregard for this area and its citizens. He said that the first mistake of the City was the location of the Airport and the second was Springtown. He felt that the five acre development was a mistake and should not have been permitted. He spoke of the poor farming conditions in the area and said that after reading the EIR he could see nothing wrong with the proposal. He said that he would have been more pleased to have seen the development under the City of Livermore but no way could that have been done under the present governmental attitude.

There was no one else present desiring to speak.

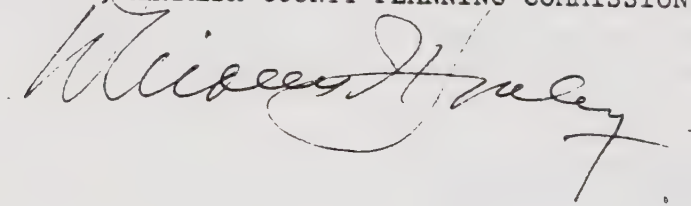
Commissioner Shockley moved continuance to May 2, 1983 at 6:00 p.m.

Seconded by Commissioner Sutherland and carried.

There being no further business the meeting adjourned at 9:20 p.m.

WILLIAM H. FRALEY

SECRETARY, ALAMEDA COUNTY PLANNING COMMISSION

A handwritten signature in dark ink, appearing to read "William H. Fraley", is written over the typed name and title. The signature is fluid and cursive, with a large initial "W" and a long, sweeping underline.



5. Work Session - Current Ability to Regulate Outdoor Advertising Structures.

The Commission held a work session on the above subject matter.

The meeting adjourned at 4:30 p.m.

The meeting reconvened at 6:00 p.m.

MEMBERS PRESENT:           Griffeth Tully, Chairman  
                          Paul Bernhardt  
                          Shirley Douglas  
                          William Leonard  
                          Barbara Shockey  
                          Sid Sutherland

MEMBERS ABSENT:           George Spiliotopoulos

OTHERS PRESENT:           William H. Fraley, Planning Director  
                          Bruce Fry, Assistant Planning Director  
                          Betty Croly, Assistant Planning Director  
                          Bill Allin, Planner III  
                          Gerald Wallace, Planner III  
                          Randal Dean, Planner III  
                          Stephen Richards, Planner III  
                          Georgia Rubiolo, Recording Secretary

The meeting was called to order by Chairman Tully.

Consent Calendar:

6. Approval of Minutes of April 18, 1983.

It was moved by Commissioner Shockey, seconded by Commissioner Douglas and carried that the minutes be approved as mailed.

Regular Calendar

7. 1521st Zoning Unit- General Plan Amendment and Rezoning Consideration Las Positas Area.

Miss Croly presented the staff report. She recommended that the Commission take public testimony, ask questions of the staff and continue the public hearing to May 16, 1983 at 1:30 p.m.

Mr. Jack Smith, attorney representing the applicant, indicated that the applicant would not make a presentation at this time.

Commissioner Douglas indicated that at the last hearing there were a number of inquiries about the user fees that will be imposed on the residents of this project. She asked if it would be possible to summarize what the user fees might be. She indicated that the applicant has said a percentage of units would be low and moderate income and asked if the staff would assess whether or not that is possible and give the Commission some assessment as to what they foresee as the possible number of low and moderate income units.

Commissioner Shockley asked for a comment in the EIR concerning the economic and administrative impact of Las Positas on the extensively urbanized areas of the unincorporated part of Alameda County, particularly on all the west side of the Hayward Hills.

There was no one else present desiring to speak concerning this matter.

Commissioner Shockley moved continuance to May 16, 1983 at 1:30 p.m.; seconded by Commissioner Douglas and carried.

8. 1541st Zoning Unit- Lawrence Di Pietro - Petition to reclassify four parcels containing approximately 40.72 acres from the R-2-L-B-E (Single Family Residence, Limited Agriculture 10 acre M.B.S.A.) District to the R-1-L-B-E (Single Family Residence, Limited Agriculture, 5 acre M.B.S.A.) District, located at 1300, 1309, 1320, 1339 Hillilker Place, south of the intersection with Las Positas Road, Livermore Area, Assessor's No. 99-15-119,20, 21, 22-1.

Mr. Dean presented the staff report. He noted that the City of Liverore has recommended that the reclassification be denied. He recommended that the Planning Commission take public testimony and if no testimony is offered to the contrary that the application be denied.

Mr. Dave Waterman, resident of one of the houses on the land, said that in determining whether the rezoning is in the public interest, he would ask if housing is in the public interest. He said that there is a large demand for housing. He said that the City Council will consider an application for 70 units on property immediately east of this land. He spoke concerning the septic tank system evaluation and consistency with agricultural land use. He said that this land has not been agriculturally used for many years. He noted that the City will allow a septic tank on one acre. He also noted that the staff analysis stated that a negative declaration is proposed which means that there would be no harm to the environment by this rezoning as requested. Zone 7 says that the proposal appears to conform to the Waste Water Management Plan. He believed that the City's sewer policy allows the City to enforce their no growth policy. He also noted that this land is closer to City Hall than other

Planning Commission Minutes of Meeting  
May 16, 1983 - Page 2

After a brief discussion the Commission agreed that the 1529th unit would be continued to June 6, 1983 for the purpose of establishing a further continuance date.

Commissioner Douglas moved the Commission accept the consent calendar as recommended.

~~Seconded~~ by Commissioner Spiliotopoulos and carried.

Regular Calendar:

4. 1521st Zoning Unit- Las Positas General Plan Amendment and Rezoning Consideration - LAS POSITAS AREA.

Miss Croly presented the staff report. She indicated that the 45 day review period for the EIR ends today. She said that the staff will prepare the final EIR in the next month and will have it ready for distribution and public review by mid June. She recommended that the Commission take testimony today and continue the matter to June 20, 1983.

Mr. Jack Smith, attorney with the firm of Hailey, Schenone, Tucker, Birchfield and Smith, said that he recognizes that this project has substantial impacts on the local area, County of Alameda and the Bay Area in general. He said that today they will bring testimony of experts involved in the project and who were involved in the preparation of the EIR. He indicated that they would welcome any questions.

Mr. John Spencer, Architect and Planner, Manager of Planning Services for Wilsey and Ham spoke about the plan and the number of alternatives in the EIR and their comments on the alternatives.

He referred to Figure 2.1 and indicated that they would request that a number of modifications be included in the diagram. He reviewed the changes that they would request. He said that in Figure 5-18 all of these changes have been included. He said that they have taken a look at this alternative and recognize it as a refinement of the diagram that they prepared.

He said that their major criticism is that it includes the FCC site as a safeguarded long term use for the Las Positas Valley. He felt that the inclusion of this property is a mistake and recommended that the area be given a high density residential or industrial designation appropriate to the "town center" which would be east of the site. He noted that the site would be adjacent to an industrial park south of the Town Center. He indicated that in their phasing Diagram 2.5, this property is the fourth phase and they feel that the FCC would have ample time to relocate the facility and move by the year 2000.

Mr. Spencer noted that Figure 2.1 of the Draft EIR includes 4200 acres on the valley floor and he noted that it would be a balanced community with



45,000 people and would include business and office areas that would employ 22,000; about 50% of the area would be residential. He noted that the planned density averages 8.1 units per acre and this would offer a wide range of housing choice. He noted that there are 103 commercial acres included in the plan, mostly in the Town Center, a shopping district that would serve primarily the population living in Las Positas.

Mr. Spencer noted that in the design concept they developed there are three major elements:

(1) Topographical: Hillsides surround three sides of the development. They have located the community on the valley floor with the intent of preserving these hillside areas for open space. (2) Access from the existing interchanges along I 580. That would be connected into two loop systems. (3) A density gradient.. The idea is that the middle of the community would be where the commercial and high density housing would be. Density would decrease as one moves away from the center of the project. The center of activities and community focus is a means to encourage alternative modes of transportation. He offered to answer any questions on the land use plan.

Commissioner Shockley asked how Mr. Spencer would see this new town concept relating to the City of Livermore in the future.

Mr. Spencer replied that the City bounds the property on two sides. He said that they developed the plan so that the impacts on Livermore would be minimized. He said that the result would be two strong communities with two community focuses, one on the north side of I-580 and one on the south side of I- 580 freeway.

Commissioner Spiliotopoulos asked how many acres of the project area are owned by the Las Positas Land Company.

Mr. Spencer replied that approximately one-half are controlled by Las Positas Land Company.

Commissioner Douglas asked for clarification as to the additional parcels now to be included in the Plan.

Mr. Spencer explained that the parcels were originally included in the plan only partially; they are now suggesting that the full parcels be included with the exception of the Gun Club which they now recommend be taken out of the area of the plan.

He also advised that it will be 15 years before the final phase is built and the FCC property would be in the final phase so it would be a minimum of 15 years to permit the relocation of the facility.

Commissioner Shockley didn't think that is a long timeframe in terms of that use.

Mr. Lee Ham of Wilsey and Ham discussed the financing of Las Positas. He explained that the first mechanism they created was the public land acquisition fee. There are 4500 acres involved in the plan; about 3000 will be developed and the balance will be needed for public areas. The proposal calls for each parcel subdivided to dedicate about 1/3 of their land for public use. Where less than 1/3 is need for public use then they will have to pay fees for the difference between what they dedicate and the 1/3. On the other hand, if there is more than 1/2 needed for open space, that landowner would be paid for that portion. He explained that only 2/3 of the land is to be developed with private uses. For the purpose of the EIR they assumed that everyone would pay a fee because there was no way to determine when fees should be paid, so they used the method of charging a fee and running the numbers on that. There are enough monies left to buy they land as it works its way down. Mr. Ham added that at the time the final map is filed each developer will be required to make the dedication of public lands.

He said that the second area was to raise the money for infrastructure. He explained the methodology of determining the number of residential and equivalent units in the entire plan and said that number is about 25,000. They then added up all the cost of building all the infrastructure that is needed and determined the per unit fee. He said that the per unit fee is proposed to be paid at the time that the building permit is taken out. There has to be money to build the on and off site improvements necessary to achieve the development; these costs were estimated and the sponsor's advance is recommended. At this point the sponsor's advance is roughly \$14,000,000 and those monies will be advanced to the County to commence development.

Commissioner Spiliotopoulos asked how much of the infrastructure would be completed with this \$14,000,000.

Mr. Ham advised that the development fee for all the infrastructure but the schools is \$4600 per unit. The schools will add \$3500 but that is only assigned to the residential units. He said that the sponsor's advance will cover the first two steps of the project. At the first step development monies will come from the developers either through the dedication of land or payment of fees. At the time you have completed step 1 you have sufficient money to build step 3, step 2 already being finished. By the time you are finished with the development of step 2 you have the money to build the improvements under step 4; at all times you have the money to develop the step you are in plus the step ahead of you.

If certain areas did not develop, Mr. Ham said it wouldn't make any difference because you don't go to step 2 until you have finished step 1. This project is not time sensitive in terms of impact of money on the property owners in the development.



Planning Commission Minutes of Meeting

May 16, 1983 - Page 5

He explained that the analysis in the EIR is done on a yearly basis. What he is doing is separating this from the time constraints of the EIR and taking it in steps.

Commissioner Douglas asked if Mr. Ham is saying that if you don't have the number of buildings completed in Step 1 you would not go into Step 2.

Mr. Ham said that you would continue with that step until you finish it before you go to the next one. He said that if each step was one year it would look like it does in the EIR; however it isn't.

Commissioner Spiliotopoulos noted that in Step 1 you have public land acquisition. Suppose the rest of the land isn't available for purchase; how would that effect the development plan.

Mr. Ham said that the plan is for all the property out there and they may never acquire all the property. The proposal is to include every property owner within Las Positas.

Commissioner Shockley asked what would happen if the housing market fails.

Mr. Ham said that you would not build any new areas until you have finished what is available to you in phase 1. He said that all the utilities for steps 1 and 2 are built out of sponsors advance so that until you have developed step 1 and used that up the improvements would remain there until the housing market picks up and someone builds housing. He stressed that this is a "pay as you go" project.

Mr. Ham summarized by saying that all monies will be raised with direct donation of property or sale of property or through the collection of fees to build the infrastructure. The way the program is set up the total cost of all the infrastructure is about \$180,000,000, or about \$4600 per unit. The County has \$14,000,000 to start the project, they collect \$180,000,000 more so that they have \$194,000,000; they have spent \$180,000,000 so they have \$14,000,000 to return to the sponsor who advanced it.

Mr. Ham discussed the impact on schools. He said that it is the States' responsibility to house and educate all children in the State. Need is identified by the State as a combination of overcrowding in the schools and increases in enrollment. Because of an inability to second guess what the state would do, they have proposed the impact in the EIR as the worst case. He said that they assumed that the state would fail to pay any money for the children in the Las Positas development; they do not believe that will be the case. He said that the EIR included the \$3500 per unit for the 18,000 dwelling units to raise roughly \$35,000,000 to build the schools. He said that he believed that the Livermore School District will get its share of the state money and that \$35,000,000 is a gross overstatement of required funds. He said that the net effect of all this



Planning Commission Minutes of Meeting

May 16, 1983 - Page 6

is that all the subdividers will dedicate about 1/3 of their property to meet the need for public lands, the builders will pay \$4600 for all major improvements except for the schools and if the state fails to provide any money for schools the residents will have to provide an additional fee of \$3500 per residential unit.

Mr. Ham spoke about the five acre parcels on Bel Roma Road and the impact of this development on them. He stated that only if they subdivide and build will they have to pay a development fee. The only services they will have to pay for in the CSA is for water and sewer if they elect to use these services. He said that unless they sell their property, their taxes will not be increased any faster than anyone else's even though the property may be rezoned.

Commissioner Douglas asked for a review of the estimated range of user fees and how that would affect the statement that 60% of the proposed units would be low and moderate income housing.

Mr. Ham said that the analysis indicates that the user fees are generally equivalent to similar user fees in other areas. The other aspect of the costs, in terms of housing, relates to the use of the recirculated waste water for irrigation; there is a major savings in buying the recirculated water. He said that the benefits have been applied to user fees to reduce them below the market.

Commissioner Douglas said that one of the mitigations was the establishment of a Community Service District rather than a CSA. She asked for comment on the difference between the two.

Mr. Ham said in his opinion the ideal situation short of a new city is to have a CSA with the Board of Supervisors acting as Directors of the CSA as well as in their existing capacities. He said that in that way the land use decisions and economic decisions will be made by the same body. He said that if you join those two together in one body you have a more efficient and better organized community.

He added that this development would not have an effect on the appraised value of the Bel Roma properties.

Mr. Jack Smith advised that there has been discussion in the newspapers concerning an overall assessment district for the area. He said that was never proposed by himself or the Las Positas sponsors. It was never intended to be used. He assured the residents on Bel Roma Road that they need not have any fear of an assessment of their property. He said that he would resist the use of an assessment district in any instance.

Mr. Smith indicated that Mr. Gary Lee of Lowry Associates, consultants who have designed all successful systems of this nature, would speak concerning the proposed wastewater disposal method.

Planning Commission Minutes of Meeting

May 16, 1983 - Page 7

Mr. Smith complimented the Planning staff for an outstanding job of assessing the various aspects of this proposal. He said that there may be another system of export in the Valley which would be another line. He said that if that came about and was economically feasible they would want to be part of that line. He said that the existing export line is not sufficient now and was an instrument of the no growth people and it is unfair and unfortunate to the landowners in the Valley. He assured the Commission that if there is an export line in the future they would use it if it is available at the time they move in to develop.

Commissioner Shockley asked if Mr. Smith would agree that the CSA is preferable to a CSI.

Mr. Smith said he would agree but thought that either system would work.

Commissioner Leonard asked if new legislation would not have a negative impact on the existing land owners by assessing their land automatically for a CSA.

Mr. Smith replied that to his knowledge this would not happen. Under the system they are proposing that would not happen.

Mr. Gary Lee of Lowry Associates described the proposed waste water treatment plan which includes reverse osmosis for which the primary purpose is the removal of salts. However, it also is successful in removing nitrates. He reviewed existing systems operating successfully and referred to Orange County as the location of a plant that handles 5,000,000 gallons per day and has operated since 1975. San Diego Country Estates also has a plant handling 225,000 gallons per day and uses the water for municipal purposes. He cited several other existing systems.

Mr. Lee said that during 1980 there were approximately 546 reverse osmosis plants producing 137,000,000 gallons per day of water; this is world-wide. Desalting as a whole was producing about 2,000,000,000 gallons per day. He said that reverse osmosis is the preferred method of water treatment; they are convinced that it is not new or untried.

Commissioner Spiliotopoulos asked if Mr. Lee has any numbers on the cost of processing per gallon.

Mr. Lee believed that was answered in the first EIR and said he would defer to the files.

Dr. Claude Gruen of Gruen and Associates spoke of the fiscal portion of the plan. He said it does allow protection to the people involved and is a pay as you go scheme. He said that the Commission has inquired as to the capital improvement costs. The \$14,000,000 sponsor's deposit would cover the initial major public facilities costs such as a sewer treatment plant,

the road from I 580 and infrastructure to deal with the first dwelling units. If they were not developed you would not go to the next phase of the capital improvements.

Dr. Gruen then spoke of operating costs. What has been done in the EIR is to budget costs on a per capita basis and assume those costs will be the same in the future. He said that they did not use the same method to come up with the result. Those future funds are assumed to decline. He said that they are using historical averages to project the costs but the share of money coming from outside local sources has declined and that is what gives the deficits shown for the County's general fund and road fund.

He said that the important thing is that the EIR does point out that the average revenue is higher for any new development than the average revenues coming from existing development. He said that if you do have a reduction in revenues you are better off with a new development.

Commissioner Douglas asked if the assumption of declining revenues for local government is not based on reality.

Dr. Gruen said that jurisdictions are not sitting there doing nothing; they are attempting to increase their revenues.

Commissioner Shockley asked if the 60% low and moderate income housing has been factored into the considerations of Dr. Gruen.

Dr. Gruen said that on the revenue side the fees that have been used are the fees that were developed based on estimated costs and there was no special provisions for anyone.

Dr. Gruen said that in regard to the cumulative balance, the CSA with the proposed fee structure shows a significant positive balance. One thing that could happen is that the fees could be lowered or other items could be picked up as part of the CSA. There is enough to handle that. He said that in the cases of capital and operating costs, the project is certainly financially feasible.

Commissioner Spiliotopoulos asked who actually prepared the fiscal report.

Dr. Gruen said that his firm produced the initial one and the one before the Commission now was prepared by Angus MacDonald Associates. He said he is currently commenting on the Angus McDonald report as that is the one that suggests the danger with regard to cumulative impacts. He felt this is because they may not understand how the financing is to work.

Commissioner Douglas asked for a response to the statement by MacDonald Associates in the EIR that actual costs might be more than those currently estimated.



Planning Commission Minutes of Meeting

May 16, 1983 - Page 9

Dr. Gruen said he didn't think so. He said that his firm just completed studies of Spokane, Washington and there the road maintenance costs are comparable with the figures in the Las Positas EIR. He said that after that study he did not feel that the estimated costs are low. He indicated that if there is a requirement for flood control, that would be covered under a special district.

Commissioner Spiliotopoulos asked if this method has been tried in any other new town development.

Dr. Gruen said that the only specific one like this is in San Bernardino County. He said that he has seen this concept work well but it has not been carried this far. He cited Mission Viejo as an example.

Commissioner Douglas asked if the Commission would have an analysis of the mitigation suggestions.

Mr. Allin said that the staff would ask for comments by MacDonald and Associates.

Commissioner Douglas asked Dr. Gruen what kind of actions are necessary to mitigate the negative fiscal impacts.

Dr. Gruen said that what has been recommended to deal with the vulnerability of the project - that is, an assessment district, he felt would create the very problems they are trying to avoid.

Mr. Allin said he didn't know if there will be a final answer on the question of fiscal impact mitigation. The staff will ask McDonald Associates to respond to all comments on the fiscal analysis. They may ask Gruen and Gruen Associates as well.

He indicated that in regard to Flood Control there currently are drainage fees and a facilities improvement fund for Zone 7 Trunkline facilities. He said that if, the Zone runs short of funds needed for flood control project they may impose a benefit assessment.

Mr. Smith said that he had nothing further to add in regard to the proposed affordable housing for lower and moderate income. He said that those terms are difficult to deal with. He said that affordable housing has been defined by HUD based on the cost of housing itself. However, that did not take into consideration very high current interest rates. When interest rates are high even though housing may be affordable the financing may make it impossible for people to buy.

He said that he would question how affordable the housing would be at current market interest.

Commissioner Shockley asked whether provision of services is more costly for all new facilities and the project would be less able to provide for low and moderate income households.

Smith said that he did not believe so as most cities are looking to use bonds to finance operational costs. This is a pay as you go project for all new facilities and there would be fewer problems than with all new infrastructure.

Commissioner Spliotopoulos was concerned whether this fiscal plan will

Ron Rago of Bel Roma said that today the Commission has been presented with a letter with 19 signatures addressing the concerns of the property owners representing about 40% of the owners in the proposed area of development. He said that there is another major element that must be dealt with, Alameda County must be responsible to the people in this district. He said that Alameda County must demand that the Las Positas Land Company have total ownership or options on all the property involved. He asked what would be done regarding 50% of land that is not under their control. He asked what would be done if the property doesn't develop and the future of the whole town is dependant on that. He said that the people in the Bel Roma Road Area are not going to stand by and let the Las Positas Land Company and Alameda County put forth a project that will ruin their lifestyle. He felt that they are being asked to proceed with many uncertainties with no guarantees. He asked that the Commission consider the lives of the people in the Bel Roma Area.

Commissioner Douglas suggested a work session on the fiscal impact of the project.

After further discussion it was agreed that this matter would be continued to June 6, 1983 for the purpose of selecting a date for a work session in order to determine fiscal impacts and further continuance of the public hearing date.

Commissioner Douglas moved continuance to June 6, 1983 for the purpose of establishing a date for work session and continuance to June 20, 1983 for the public hearing.

Motion seconded by Commissioner Shockley and carried.

MINUTES OF MEETING  
JUNE 6, 1983  
COUNTY PLANNING COMMISSION OF ALAMEDA COUNTY

A work session of the Alameda County Planning Commission was held on June 6, 1983 at the hour of 1:30 p.m. The meeting was held at the Alameda County Public Works Building, 399 Elmhurst Street, Hayward, CA.

MEMBERS PRESENT:

Griffeth Tully, Chairman  
Paul Bernhardt  
Shirley Douglas  
William Leonard  
Barbara Shockley  
Sid Sutherland

MEMBERS ABSENT:

George Spiliotopoulos

OTHERS PRESENT:

William H. Fraley, Planning Director  
Betty Croly, Assistant Planning Director  
William Allin, Planner III  
Paul Deutsch, Planner III  
Angus McDonald  
Rose Moore, Recording Secretary

The work session was called to order by Chairman Tully.

1. FISCAL PLAN FOR LAS POSITAS PROJECT - Commission work session with consultants and staff to discuss fiscal plan for the Las Positas project.

Mr. Fraley introduced Mr. Angus McDonald who made a presentation on the Las Positas Fiscal Impact.

Mr. McDonald spoke on the impacts of the project as proposed. His presentation was separated into three different subjects, County Assessment, Capital Investment and Operating costs and Direct Impacts of Las Positas on site and off site.

Mr. McDonald answered questions of the Commission.

Chairman Tully thanked Mr. McDonald for his presentation.

The meeting recessed at 4:00 p.m.



6. 1521ST UNIT - LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING  
CONSIDERATION - LAS POSITAS AREA.

Miss Croly presented the staff report. She recommended that the Commission take testimony and continue the matter to July 18, 1983.

Ms. Gail Valdenega asked what would happen if a property owner did not want to be part of the project. She did not feel that the responses had sufficiently covered her questions.

Commissioner Shockley moved continuance to July 18, 1983.

Seconded by Commissioner Leonard and carried.

7. 1529TH ZONING UNIT -SHAPELL INDUSTRIES OF NORTHERN CALIFORNIA - application for reclassification of the 956 acre Jensen and Slater Ranches from two existing PD (Planned Development) Districts Jensen Ranch - 1220 units; Slater Ranch - 162 unites ) to another PD District (Known as the Palomares Hills development) to permit development of 2118 units (238 single family detached 1880 attached units), located with primary access from Villareal Drive, northerly of E. Castro Valley Boulevard, Castro Valley, unincorporated Alameda County (continued from May 16, 1983).

Mr. Sorensen presented the staff report. He recommended reclassification to the PD District.

Dan Hancock, representing Shapell, recommended approval of rezoning, because this would provide a wider range of housing in the project. He noted the project was endorsed by both the Castro Valley Municipal Advisory Council and Chamber of Commerce.

Commission Shockley asked what kind of responses were given as far as solar energy and 1 year agreement.

Mr. Hancock said that State building regulations (Title 24) require extensive energy saving measures to be included in all structures. Mary Drag, representing Greater Canyon Area Association, agreed with a PD District, but she still felt there were too many units in the project. She felt that after 500 units sell and are occupied, Shapell should wait until I-580 improvements are completed. She was also concerned about proposed grading.

Commissioner Shockley asked if grading can be controlled.

Mr. Sorensen responded that plans are not precise at this time, but grading can be controlled. Specific grading and design review will be done during subdivision and site development review.

3. SET PUBLIC HEARING

1570TH ZONING UNIT - PLANNING COMMISSION INITIATED - STROBRIDGE AVENUE  
- Planning Commission initiated reclassification of six parcels totalling approximately 2.078 acres located at 21647 and 21655 Redwood Road and 2338 Vegas Avenue, bordering I-580 on the south, Castro Valley presently classified in the R-1 (Single Family Residence), R-4 (Multiple Residence), R-S-D-25 (Suburban Residence, 2,500 square feet m.b.s.a.) and C-1 (Retail Business) Districts, bearing County Assessor's Designation: 415-80-1-3, 6-3, 11-3, 23, 32, and 55.

It was moved by Commissioner Shockley, seconded by Commissioner Leonard and carried that the minutes of July 5, 1983 be approved, that the 1538th Zoning Unit be continued to August 8, 1983 and that the Planning Commission initiate rezoning consideration as recommended by staff for the 1570th Zoning Unit.

The motion carried unanimously.

3. 1521ST ZONING UNIT - LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATION - LAS POSITAS AREA.

Miss Croly recommended that the Planning Commission review the staff analysis including the issues report, take public testimony and continue the matter to August 8, 1983.

Mr. Paul Deutsch summarized the issues report.

Commissioner Shockley asked if it is more difficult to make assumptions because the new town is planned so close to existing municipal areas.

Mr. Deutsch said that factor limits the comparability of Las Positas with other new towns. The fact that it is almost an extension of Livermore may work to its advantage or may work to its detriment.

Mr. Allin said that projected employment growth in the Valley would be within an easy commuting distance to Las Positas. He noted that, as proposed, Las Positas would start as a residential community serving needs generated elsewhere eventually becoming a balanced community.

Commissioner Douglas asked if there would be the ability in the revised EIR to do an analysis of what would happen if the Commission use different assumptions. She said that there could be a worst case and best case and the impacts would be very different.

Mr. Allin said that some of this has been done. He added that staff is aware that revisions to ABAG projections have been completed and will be addressed in the Final EIR.

Mr. Fraley advised that the staff will select an appropriate range of alternatives including no project, so that the Commission will be able to assess those impacts.

Commissioner Douglas asked for comment in terms of determining the need for the project in the first place and also in terms of the issue raised about whether or not the employment projections are realistic.

Mr. Allin said that the staff position is that there is a very broad range of employment and housing projections that can be derived under sets of reasonable assumptions.

Commissioner Spiliotopoulos noted that the job to housing ratio seems to be a big issue in the Valley right now and he thought it would be beneficial to run various scenarios for the information of the Commission. He asked if the Commission will have that kind of analysis.

Mr. Fraley said that we might have a low, high and middle projection.

Commissioner Spiliotopoulos asked if there will be a staff evaluation of a CSA versus a CSD.

Mr. Allin said that is one of the points that will be addressed by the fiscal consultant, Angus McDonald; they are also dealing with the issues of incorporation and annexation.

Commissioner Spiliotopoulos asked if the employment assumptions are basically the jobs created by the development occurring in Pleasanton or if they also include potential development in Livermore.

Mr. Allin said that a market area that includes San Ramon, Pleasanton, etc., or basically a 20 minute driving range of this project.

Commissioner Spiliotopoulos cautioned the staff not to rely entirely on the projections of ABAG or the City of Livermore. He said that this Valley is a prime area for commercial development in the State and it would be shortsighted to say it is not going to develop.

Commissioner Douglas said that in addition to the amount of housing, she has a question on the kind of housing, particularly low income and multifamily housing. She asked for an evaluation of how it would be possible to have the multi-family uses built earlier in the project. She said in regard to low and moderate income housing, that the County should explore ways to make sure the project will provide low and moderate income housing. She wondered if these mitigation measures will be addressed in the revised EIR.



Mr. Allin said it is possible, in the zoning conditions, to set up certain criteria in terms of affordable housing and it is also possible to make certain adjustments in phasing of the project.

He noted that one of the issues is who will assume responsibility for marketing the project.

Mr. Fraley advised that the Commission is not limited in their ability to implement the proposal so if the proposal is for 85% low and moderate income housing, the County has wide discretion in conditioning the project to achieve that.

Commissioner Leonard asked how the cost of a new regional sewer plant could be built into the evaluation of the proposal.

Mr. Allin responded that the analysis has dealt primarily with the cost of a discrete sewerage system for the project. He noted that the export system, if shared with other developments, would probably be less costly than the on-site system.

Mr. Fraley said that if a regional facility comes on line there would be a condition that says that Las Positas utilize that facility.

Commissioner Shockley asked if the County role in assuming responsibility for off-site improvements has been assessed. She said that she is assuming that these would be new activities in Alameda County. Mr. Fraley said that this would be a new role for the County although it would not be new in "county government." He assured the Commission that the staff will make recommendations on every issue that the Commission must respond to. However, some of the issues will require value judgments that the Board of Supervisors will have to make.

Commissioner Shockley asked that the record show that before a decision is made on this proposal, all the people including the people living in the unincorporated urbanized area, have an opportunity to know what the impact of this project will be on them.

Mr. Fraley commented that it would not be possible to tell a citizen in Ashland what will happen if a CSA is achieved.

Commissioner Shockley said she is thinking of the governmental impact and noted that there had been a recent article relating to city vs. city competing for industry and commercial. She asked if this will mean city vs. County in the future.

Mr. Fraley said that could be true because commercial and industrial uses generate revenue for local government and the state without

creating amounts of user demand for services comparable to residential development.

Commissioner Douglas referred to the issue of multiple ownerships and asked if there would be an evaluation of what would happen to the project if it only dealt with the particular areas owned by the applicant.

Mr. Fraley said that this alternative could be studied but nevertheless is not the current proposal. He said he did not foresee that as a realistic alternative because the issue being determined is whether the Las Positas Valley should urbanize.

Commissioner Douglas asked if there is a possibility of achieving a much smaller project based on ownership.

Mr. Fraley said that it should be based on sound planning principles and ownership and whatever the Commission feels is justified.

Commissioner Douglas asked if the staff will have an analysis as to what extent low income rental housing will be factored into the project.

Mr. Fraley responded that for every identified impact there will be a mitigation measure.

Commissioner Tully moved continuance to August 8, 1983 at 6:00 p.m.

Seconded by Commissioner Spiliotopoulos and carried.

4. 1563rd ZONING UNIT - MARY L. WEBB - Petition to reclassify one parcel containing approximately 10 acres from the A (Agricultural) District to the R-1-L-B-E (Single Family Residence, Limited Agriculture, 5 acre m.b.s.a.) District located at 4788 Bel Roma Road, at the northern end of that road, Livermore area, bearing County Assessor's Designation: 99B-4600-2-6.

Mr. Wallace presented the staff report. He recommended that the Commission take public testimony, adopt the negative declaration and recommend to the Board of Supervisors that the subject property be reclassified as petitioned.

Mr. Henry Bettencourt of Bettencourt Realty concurred with the staff recommendation.

He indicated that they contacted the immediate neighbors and as far as they know they have no objection.

There was no one present opposed to the application.

Planning Commission Minutes

August 8, 1983

Page 3

The meeting was called to order by Vice-Chairman Spiliotopoulos.

CONSENT CALENDAR

1. 1551ST ZONING UNIT - IRMANDADE DO BOM JESUS MILAGROSO DO ESTADO DE CALIFORNIA - Petition to reclassify one parcel containing approximately 45,000 square feet (1.03 acres) from the R-1 (Single Family Residence) District to a PD (Planned Development) District to allow social and religious activities (continuance of existing uses) located at 21160 Ocean View Avenue, northeast side, at the corner of Ash Street, Hayward area, bearing Assessor's Designation: 414-86-1. (Continued from June 6, 1983)
2. PLANNING COMMISSION DETERMINATION - 1375TH ZONING UNIT - Request of Ridgecrest Townhomes Associates for determination that proposed changes may be considered under the Conditional Use Permit procedure.

It was moved by Commissioner Shockley, seconded by Commissioner Douglas that the 1551st Zoning Unit be continued to September 6, 1983 as requested, and that the Planning Commission determine that the proposed change in the Planned Development of the 1375th Zoning Unit is minor and may be considered under the conditional use permit procedure, as recommended by staff.

The motion carried unanimously.

REGULAR CALENDAR:

3. 1521ST ZONING UNIT - LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATION - Las Positas area (Continued from July 18, 1983)

Mr. Fraley advised that problems have arisen in getting satisfactory traffic material back from the consultants and therefore on August 22, 1983 the staff will recommend that this matter be continued to September 6, 1983. He said that the staff does not anticipate that the final EIR will be available prior to the time that the Commission has their meeting.

He also advised that the staff will meet with property owners in Livermore to bring them up to date on the status of this application.

Mr. Allin presented the staff report. He reviewed the scope of materials that will be presented as a part of the final EIR.

Vice-Chair Spiliotopoulos asked how the mix of multiples and single family units would be as compared to existing development in Pleasanton, Livermore and Dublin.

Mr. Allin indicated that he could check that out.



Vice Chair Spiliotopoulos asked if the staff knows what specifically is proposed in regards to manufactured housing.

Mr. Allin discussed several alternative types of manufactured housing but noted that at this time it is not known which of these would be provided in Las Positas..

Ms. Gail Vardenega asked when the questions that they had submitted would be answered and if the material of the Final EIR would be available to the public prior to action on the matter by the Commission.

Mr. Allin said that the questions will be answered in the Final EIR and in the final staff report. He said that staff is not certain at this time as to when those will be distributed.

Mr. Fraley advised that the current schedule is to have it available at the August 22, 1983 meeting and that it would be available to the public prior to action of the Planning Commission.

Mr. Fraley advised that the staff would recommend that September 6, 1983 be a public hearing.

Commissioner Shockley moved that the item be continued to August 22, 1983 per the staff recommendation.

Seconded by Commissioner Douglas and carried.

4. 1559TH ZONING UNIT - GREGORIA YBARRA - Petition to reclassify two parcels from the R-2 (Two Family Residence) District to the C-2 (General Commercial) District, located at 22427 Santa Clara Way, west side, at the intersection with Santa Clara Street, Hayward area, bearing County Assessor's designations: 431-92-62-1 and 63-1. (Continued from July 18, 1983.)

Mr. Fraley presented the staff report. He noted that the applicant owns the triangular shaped parcel and the Gomes family owns the adjacent parcel to the north. He said that a letter has been received from the Gomez family indicating that an auto repair facility is not appropriate at this location. He revised a letter from the City of Hayward opposed to the rezoning as requested.

Mr. Fraley said that the staff is concerned that unless both properties are zoned concurrently problems will result. He continued that the staff would recommend that if the Commission wishes to change the zoning they should use the PD district which would allow the C-1 type uses and Auto

5. Abandonment of + 170 Feet of Kilcare Road - referral from the Director of Public Works for a General Plan conformance report on request for abandonment of the most northerly + 170 feet of County Road No. 7635, Kilcare Road, Pleasanton Township, extending northerly from and including the bridge across Sinbad Creek at Mile Marker 3.68.

6. Approval of Planning Commission Minutes of July 18, and August 8, 1983.

Chairman Sutherland called for testimony or comment from those in the audience for all matters on the consent calendar.

There was no one present desiring to speak concerning the above matters.

Commissioner Leonard moved that the staff recommendation be adopted for all items on the consent calendar.

Seconded by Commissioner Douglas and carried.

REGULAR CALENDAR:

7. 1521st Zoning Unit - Las Positas General Plan Amendment and Rezoning Consideration - Las Positas Area (continued from August 8, 1983).

Miss Croly recommended that the Commission raise any questions that they might have of staff and continue the matter to September 6, 1983. She advised that the final EIR and staff analysis will be completed upon submittal of all materials by the consultant for the proponents of the project. She estimated that it would be September 22, 1983 before the final EIR and staff recommendation are available. She said at that time the Commission could continue the matter to October or a special meeting date the last week of September.

There was no one else present desiring to speak concerning this matter.

Commissioner Tully moved that the matter be continued to September 6, 1983 as recommended by staff.

Seconded by Commissioner Bernhardt and carried.

8. 1570th Unit - Planning Commission Initiated - Strobridge Avenue - Planning Commission initiated reclassification of six parcels totalling approximately 2.078 acres located at 21647 and 21655 Redwood Road and 2338 Vegas Avenue, bordering I-580 on the south, Castro Valley, presently classified in the R-1 (Single Family Residence), R-4 (Multiple Residence), R-S-D-25 (Suburban Residence, 2,500 square feet m.b.s.a.) and C-1 (Retail Business) Districts, bearing County Assessor's Designations: 415-80-1-3, 6-3, 11-3, 23, 32, and 55.

7. APPROVAL OF MINUTES OF AUGUST 22, 1983

It was moved by Commissioner Douglas, Seconded by Commissioner Bernhardt and carried that Item Nos. 3 and 4 be continued to October 3, 1983, that Item No. 5 be determined to be a minor modification to Tract 5171, that Item 6 be found to be in conformance with the General Plan and that the minutes of August 22, 1983 be approved, all per the staff recommendation.

REGULAR CALENDAR:

8. 1521ST ZONING UNIT - LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS

Mr. Fraley advised that the County Staff is currently reviewing traffic studies recently submitted by the proponents consultants. He indicated that after final review there will be the need for a reasonable amount of time to be available between the time the final EIR is distributed and the time that the Commission takes final action. He asked if the Commission could meet on September 26, 1983 should it be necessary.

After discussion, the Commission members present indicated that September 26, 1983 at 6:00 p.m. would be a convenient meeting time.

There was no one else present desiring to speak concerning this item.

Chairman Sutherland continued the matter to September 19, 1983.

9. 1570TH ZONING UNIT - PLANNING COMMISSION INITIATED - STROBRIDGE AVENUE - Planning Commission initiated reclassification of six parcels totalling approximately 2.078 acres located at 21647 and 21655 Redwood Road and 2338 Vegas Avenue, bordering I-580 on the south, Castro Valley, presently classified in the R-1 (Single Family Residence), R-4 (Multiple Residence), R-S-D-25 (Suburban Residence, 2,500 square feet m.b.s.a.) and C-1 (Retail Business) Districts, bearing County Assessor's Designations: 415-80-1-3, 3-2, 6-3, 11-3, 23, and 55.

Mr. Fraley advised that this matter should be continued to September 19, 1983.

There was no one present desiring to speak concerning this matter.

Commissioner Bernhardt moved continuance to September 19, 1983; Seconded by Commissioner Shockley and carried.

10. 1566TH ZONING UNIT - EAST CASTRO VALLEY BOULEVARD - PLANNING COMMISSION INITIATED reclassification consideration of sixty-seven parcels containing approximately 72.4 acres located on both sides of East Castro Valley



2. SMP-16 - PLEASANTON GRAVEL COMPANY - Application of Pleasanton Gravel Company for approval of a Surface Mining Permit and Reclamation Plan to allow continuation and expansion of sand and gravel operations located along Stanley Boulevard east of El Charro Road, southerly of the Livermore airport, and west of Isabel Avenue, Pleasanton area, unincorporated Alameda County. (Continued from August 22, 1983.)
3. PLAN CONFORMANCE REPORT - FOOTHILL RESERVOIR - Referral from the City of Pleasanton for a report on consistency with the Alameda County General Plan of a proposal to acquire an additional 1.3+ acres to be added to 4.9 acres already owned by the City to construct an 8.0 million gallon treated water storage reservoir about 500 feet west of Foothill Road and about 40 feet north of a westerly projection of Stoneridge Drive, Pleasanton area.

Chairman Sutherland called for comment or request on the consent calendar there being none; Commissioner Leonard moved staff recommendation on the consent calendar.

Seconded by Commissioner Shockely and carried.

Therefore the Commission took action to adopt the annual report concerning SMP-12 and require that conditions 14, 16, 17, 25 and 29 be complied with prior to any further operation of the quarry. Item 2, SMP-16 was continued to October 17, 1983; and for Item 3 the Commission found that the proposed acquisition of the acreage would be consistent with the Alameda County General Plan.

#### REGULAR CALENDAR:

4. 1521ST ZONING UNIT - LAS POSITAS GENERAL PLAN AMENDMENT AND REZONING CONSIDERATIONS

Commissioner Tully asked if the Commission would be in a position to act on this matter on October 3, 1983 or if the matter should be continued to a date in the month of November.

Mr. Fraley responded that when the traffic information is submitted the staff will then be in a position to complete the EIR. He said that the current plan is that after the final EIR is prepared it will be distributed and there will be at least two public hearings after that time.

He recommended that the Commission continue the matter to October 3, 1983 so that if the EIR has been completed the Commission could consider the matter.

Commissioner Spiliotopoulos moved continuance to October 3, 1983 as recommended.

APPENDIX A

Biologists Report re. San Joaquin kit fox and Alameda striped racer, Environmental Science Associates, Inc., July 8, 1983







# Environmental Science Associates, Inc.

23-B Pamaron Way Novato, California 94947 415/883-0484

July 8, 1983

July 6 and 7 another biologist, Diane Renshaw, and I visited the Las Positas project site. We examined the area for animal sign and suitable habitat for the San Joaquin kit fox (Vulpes macrotis mutica) and the Alameda striped racer (Masticophis lateralis euryxanthus). The U. S. Fish and Wildlife Service classifies the San Joaquin kit fox as endangered and the California Department of Fish and Game lists it as rare. The Department of Fish and Game also lists the Alameda striped racer as rare. In addition to assessing the presence of the two species on the site, we reviewed background literature on these animals and their occurrence in the nearby area and interviewed other researchers and resource specialists.

## SAN JOAQUIN KIT FOX

This species presently ranges from the southern San Joaquin Valley in unfarmed regions of western Kern County along the eastern side of the Diablo range to Contra Costa County. The eastern portions of San Benito, Monterey, San Luis Obispo Counties also contain kit fox. In contrast to statements in the Draft R for the Las Positas General Plan Amendment, kit fox do not specifically inhabit brushlands. Historically their range covered the arid alkali sink and valley grassland plant communities of the San Joaquin Valley and eastern Diablo range. Conversion of these lands to agriculture has diminished the available habitat for the kit fox. /1,2,3,4/

In the Alameda and Contra Costa County regions kit fox inhabit rolling hills and annual grassland which may have scattered oaks. /5/ The kit fox is not a strong digger and will excavate existing ground squirrel burrows or previously used dens of theirs or other canid species. Kit fox are strongly territorial with respect to their dens. /1/ Each family group maintains a set of dens which are used throughout the year. These include both maternal and temporary dens used for daytime cover and nighttime resting.

Kit fox have a relatively small home range size and rarely stray farther than three miles from their dens. /6/ Pups are born in early spring (February-March) and remain with their parents in large natal or maternal dens until summer. Then in June or July, a family group usually disperses and new

1291 E. Hillsdale Boulevard Foster City, California 94404 415/573-8500

1390 Market Street San Francisco, California 94102 415/552-4775

8725 Venice Boulevard Los Angeles, California 90034 213/838-2221

offspring may seek additional territory and a new home range. The need for range expansion is determined by the scarcity of prey in an area, the kit fox population and populations of other canid species (coyote, grey and red fox). A number of nearby unoccupied and unclaimed dens are needed for use by unmated adults and new family groups from established habit areas.

In the Contra Costa and Alameda County areas, the kit fox prey upon ground squirrel, pocket mice, and desert cottontail. /5/ Although this fox may live adjacent to and hunt in agricultural lands, it will not use fields which are regularly disced or plowed. Such practices disrupt rodent populations and dens. A minimum of three years following discing is needed for reinvasion of a field of rodents and eventually kit fox. /6/

A 1973 Fish and Game report outlines the range of the kit fox in Contra Costa, Alameda, San Joaquin and Tulare Counties. /7/ The report recorded no sitings on the project site; however, kit fox occur both to the north and northeast in the Altamont Pass and Bethany Reservoir area and the proposed Los Vaqueros Reservoir site. (See Figure 1). Further studies have confirmed the presence of kit fox populations in these areas. /5/

During our field reconnaissance we examined known kit fox habitat along the western shore of Bathany Reservoir. The Department of Fixh and Game has radic collared animals in this area and located specific den sites. /6/ Dens appear as an excavated ground squirrel burrow with a spray of loose dirt about the entrance. The burrow may have one to several holes but a single entrance is common. Prey remains and scat may be found near the burrow. The habitat consisted of rolling, dry annual grassland with numerous ground squirrel holes and a moderate amount of grazing.

Field researchers in the Los Vaqueros area have radio tracked kit fox to dens which, when previously examined, did not display the "typical" characters of excavated dirt and fox sign. /6/ Instead burrows appeared as a singular hole in the ground.

Certain areas of the Las Positas site offer similar habitat conditions to the Bethany Reservoir and Los Vaqueros areas. Canid dens occur in one area. Figure 2 illustrates portions of the site which exhibit potential habitat for the kit fox. This delineation is based upon several criteria: 1) the extent of rolling, grassland areas which may be grazed or mowed but not disced, 2) the proximity of the area to large areas of similar habitat which are contiguous to known habitat areas (e.g., Bethany Reservoir, Los Vaqueros area and 3) abundance of ground squirrel burrows which show evidence of canid use.

In one portion of the site adjacent to the Livermore Rod and Gun Club, we found burrows, prey remains and fox scat which resembled the kit fox dens examined near Bethany Reservoir. However, three other species of canids are thought to inhabit this area: the coyote, grey fox and red fox. Both fox species and the coyote may excavate ground squirrel burrows and fox scats do not vary greatly between species. Consequently the burrows and sign found within the Las Positas site cannot be positively identified as that of kit fox but their features are similar enough to nearby areas to warrant further consideration. The absence of fox sign in other portions of the project area does not preclude their use by this species.



Based upon our findings, kit fox could be feeding and using dens in the Las Positas site and the other adjacent lands delineated in Figure 2. /8/ Flat agricultural lands of the Las Positas site could support rodent populations and kit fox could hunt these areas as well. In addition should kit fox populations expand in the Altamont pass and Los Vaqueros areas, suitable habitat lies to the west and south only. Brushland acts as a barrier on the north to range expansion and intensively cultivated lands and the California Aqueduct lie to the east and block movement of kit fox. Therefore the Las Positas area has the potential to be a feeding area for existing kit fox population and a future expansion area for fox.

## IMPACTS

The proposed Las Positas project would remove any kit fox habitat within the site from use by the species. The introduction of human activity and domestic dogs would disturb adjacent lands which the kit fox may presently use. The project would represent a block to western or southern expansion into Las Positas of the existing kit fox population in the Bethany Reservoir and Los Vaqueros areas.

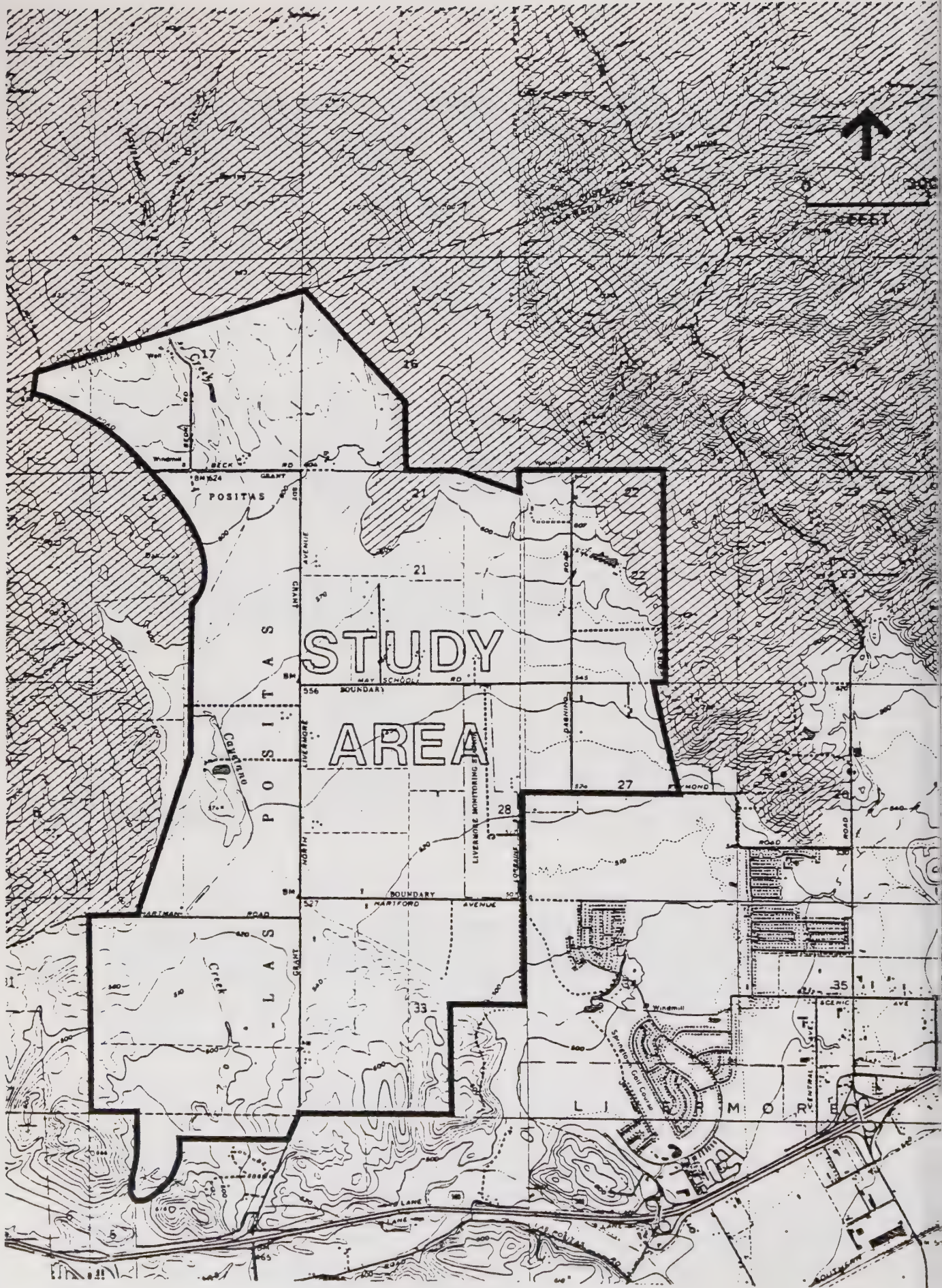
An alternative Las Positas plan is included in the Draft EIR. This plan delineates some of the kit fox habitat as open space and other portions for residential uses. This plan would remove approximatey one-third less habitat than the proposed plan but would also introduce disturbance from human activity and domestic dogs.

Kit Fox habitat delineated in Figure 2 should ideally be zoned as open space. However should this option prove infeasible, the project sponsor should consult with the California Department of Fish and Game and design the final project plan to protect kit fox habitat to the greatest degree possible. The Department should also be consulted regarding the need for further verification of kit fox on specific areas of the property proposed development.

## ALAMEDA STRIPED RACER

This species inhabits chaparral and may venture onto rocks and grassland directly adjacent to chaparral vegetation. This habitat does not exist on the site and this species would not likely be found in the Las Positas project area. 9,10/





Potential Kit Fox Habitat

FIG  
Potential Kit Fox H



## REFERENCES CITED

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## APPENDIX B

Revisions to Tables 5.39, 5.47, and 5.44 of the Revised Draft EIR,  
Angus McDonald & Associates, November 1983



TABLE 5.39

ALAMEDA COUNTY CAPITAL COSTS AND FINANCING  
LAS POSITAS GENERAL PLAN AMENDMENT CONSIDERATION  
(All figures are in thousands of constant February 1982 dollars)

ITEM	PHASES					
	PRE-DEV'T	I	II	III	IV	TOTAL
<u>COSTS</u>						
ROAD SYSTEM						
STREETS AND DRAINAGE	1,188	6,635	8,992	3,673	6,146	26,634
OFF-SITE (ALT. A)	0	11,145	12,259	14,488	17,832	55,724
LAND	750	0	750	750	750	3,000
SUBTOTAL: ROAD SYSTEM	1,938	17,780	22,001	18,911	24,728	85,358
TRANSIT CENTER					100	100
FIRE						
EQUIPMENT	195	0	0	575	195	965
STATIONS	0	200	0	640	200	1,040
LAND	0	10	0	10	0	30
SUBTOTAL: FIRE	195	210	0	1,225	405	2,035
SHERIFF						
STATION	0	0	0	250	0	250
LAND	0	0	0	10	0	10
SUBTOTAL: SHERIFF	0	0	0	260	0	260
LIBRARY						
STRUCTURE	0	0	2,300	0	0	2,300
LAND	0	0	10	0	0	10
SUBTOTAL: LIBRARY	0	0	2,310	0	0	2,310
OTHER GOVERNMENT --						
RESERVE (LAND)	0	10	20	0	20	50
TOTAL COSTS	2,133	18,000	24,331	20,396	25,253	90,113
<u>FINANCING</u>						
LAND						
LAND ACQUISITION FUND	0	20	780	770	880	2,450
SPONSOR'S ADVANCE	750	0	0	0	0	750
SUBTOTAL:	750	20	780	770	880	3,200
IMPROVEMENTS						
SPONSOR'S ADVANCE	1,383	0	0	0	0	1,383
CAPITAL IMPROVEMENT FUND	0	17,980	23,551	19,626	24,373	85,530
SUBTOTAL:	1,383	17,980	23,551	19,626	24,373	88,530
TOTAL	2,133	18,000	24,331	20,396	25,253	90,113
BALANCE	0	0	0	0	0	0

Cost Estimates Prepared by Wilsey & Ham  
Table Assembled by McDonald & Associates



TABLE 5.42  
CAPITAL IMPROVEMENT FUND  
LAS POSITAS GENERAL PLAN AMENDMENT CONSIDERATION  
(All figures are in thousands of constant February 1982 dollars)

YEAR	CSA (Total)	COSTS					REVENUE				Sponsor's Advance Payback	BALA Ann.
		ALAMEDA COUNTY Roads	Public Bldg.	SPECIAL DISTRICTS School	Parks	TOTAL COSTS	Sponsor's Advance	Development DU's	Fees DUE's	TOTAL REV.		
PRE-DEV'T	10798	1188	195	0	0	12181	12181	0	0	12181	0	0
1985/1986	0	0	0	0	0	0	0	7213	0	7213	0	7213
1986/1987	8691	12804	200	0	313	22008	0	7204	2454	9658	0	-12350
1987/1988	1121	1659	0	19975	312	23067	0	7221	0	7221	0	-15846
1988/1989	1121	1659	0	2805	313	5898	0	7204	2454	9658	0	3760
1989/1990	1121	1659	0	0	312	3092	0	7213	0	7213	0	4121
SUBTOTAL	12054	17781	200	22780	1250	54065	0	36055	4908	40963	0	-13102
1990/1991	1136	5884	2300	0	3073	12393	0	7334	0	7334	0	-5059
1991/1992	1136	5884	0	0	250	7270	0	7358	3208	10566	0	3296
1992/1993	8865	5884	0	2805	250	17804	0	7326	0	7326	0	-10478
1993/1994	1136	1798	0	2805	250	5989	0	7358	3208	10566	0	4577
1994/1995	1136	1798	0	0	250	3184	0	7334	0	7334	0	4150
SUBTOTAL	13409	21248	2300	5610	4073	46640	0	36710	6416	43126	0	-3514
1995/1996	839	5564	1465	0	250	8118	0	7294	0	7294	0	-824
1996/1997	839	5564	0	0	250	6653	0	7302	4472	11774	0	5121
1997/1998	9883	5564	0	9180	250	24877	0	7294	0	7294	0	-17583
1998/1999	839	735	0	2805	250	4629	0	7310	4472	11782	0	7153
1999/2000	839	735	0	0	250	1824	0	7285	0	7285	0	5461
SUBTOTAL	13239	18162	1465	11985	1250	46101	0	36485	8944	45429	0	-672
2000/2001	985	5995	395	0	3323	10698	0	7326	0	7326	0	-3372
2001/2002	985	5995	0	0	250	7230	0	7318	7275	14593	0	7363
2002/2003	8498	5995	0	19975	250	34718	0	7326	0	7326	0	-27392
2003/2004	985	5995	0	2805	250	10035	0	7326	7275	14601	4849	2250
2004/2005	0	0	0	0	0	0	0	7326	0	7326	7326	0
SUBTOTAL	11453	23980	395	22780	4073	62681	0	36622	14550	51172	12175	-13552
GRAND TOT.	60953	82359	4555	63155	10646	221668	12181	145872	34818	192871	12175	

NOTE: Sponsor's Advance Payback does not equal Sponsor's Advance due to independent rounding.

Cost Estimates Prepared by Wilsey & Ham  
Table Assembled by McDonald & Associates

Table 5.44

AVERAGE UNIT COST OF MAJOR CAPITAL IMPROVEMENTS  
 Las Positas General Plan Amendment Consideration  
 (All figures are in constant February 1982 dollars)

Capital Facility (Including Land Purchase)	Total Cost All Phases	Average Cost Per Residential Unit or Equivalent
Sewage Treatment	\$ 43,599,000	\$ 1,705
Groundwater Treatment	\$ 4,694,000	\$ 184
Treated Water Distribution	\$ 7,457,000	\$ 292
Potable Water System	\$ 11,450,000	\$ 448
Street Lighting	\$ 2,435,000	\$ 95
Road System	\$ 85,358,000	\$ 3,337
Fire Service	\$ 2,035,000	\$ 80
Sheriff Station	\$ 260,000	\$ 10
Library	\$ 2,310,000	\$ 90
Schools (1)	\$ 65,255,000	\$ 3,625
Parks	\$ 12,946,000	\$ 506
TOTAL:	\$237,799,000	\$10,372

## NOTE:

- (1) School per unit cost excludes commercial and industrial dwelling unit equivalents.

Source: McDonald & Associates





## APPENDIX C

Revised Transportation Analysis, A Supplement to the March 1983  
Revised Draft EIR, Wilsey & Ham, November 1983



REVISED TRANSPORTATION ANALYSIS  
LAS POSITAS GENERAL PLAN AMENDMENT  
AND REZONING CONSIDERATIONS

A Supplement to the March 1983  
Revised Draft Environmental Impact Report

November, 1983

Prepared for the  
Alameda County Planning Department  
by Wilsey & Ham





## TABLE OF CONTENTS

INTRODUCTION	1
EXISTING CONDITIONS	1
Regional Freeway System	1
Regional Arterial Network	7
Level of Service	8
Historic Traffic Growth	10
Trip Characteristics	11
Transportation System Management	14
Transit	14
Air	15
Rail	16
TRANSPORTATION IMPACTS	16
Approach	16
Traffic Forecasting Process (General Discussion)	18
Forecast of 2005 Travel Conditions (Without & With Las Positas)	19
Description of Scenarios Analyzed	26
Traffic Impacts Within Scenarios	26
Other Transportation Impacts - Airport Services	48
MITIGATING MEASURES	48
Transportation Planning Study	55
Transportation System Management (TSM) Program	56
Highway Improvements	58
Feasibility of Mitigating Measures	76
Economic Impact of Las Positas	76





## FIGURES

1	Regional Transportation Network and Study Areas	2
2	1983 ADT Existing Volumes	12
3a	Study Area Traffic Zones	20
3b	Study Area Traffic Zones With Las Positas	21
3c	Link Node Network Traffic	28
4-AM-1	2005 AM Peak Hour Traffic Volumes Without Las Positas	29
4-PM-1	2005 PM Peak Hour Traffic Volumes Without Las Positas	30
4-AM-2	2005 AM Peak Hour Traffic Volumes With Las Positas Trips Without Las Positas Network	38
4-PM-2	2005 PM Peak Hour Traffic Volumes With Las Positas Trips Without Las Positas Network	39
4-AM-3	2005 AM Peak Hour Traffic Volumes With Las Positas	46
4-PM-3	2005 PM Peak Hour Traffic Volumes With Las Positas	47
5a	I-580 Design Concept One for 2005, Expansion of Present Facility	68
5b	Weaving Using Auxiliary Lane	69
5c	Weaving Using Signalized Collector-Distributor Road	69
5d	I-580 Design Concept Two for 2005, Signalized Collector-Distributor Road	71
5e	I-580 Design Concept Three for 2005, Parallel Freeway Lanes	73
5f	I-580/I-680 Design Concept Four for 2005, Parallel Freeway Lanes	74

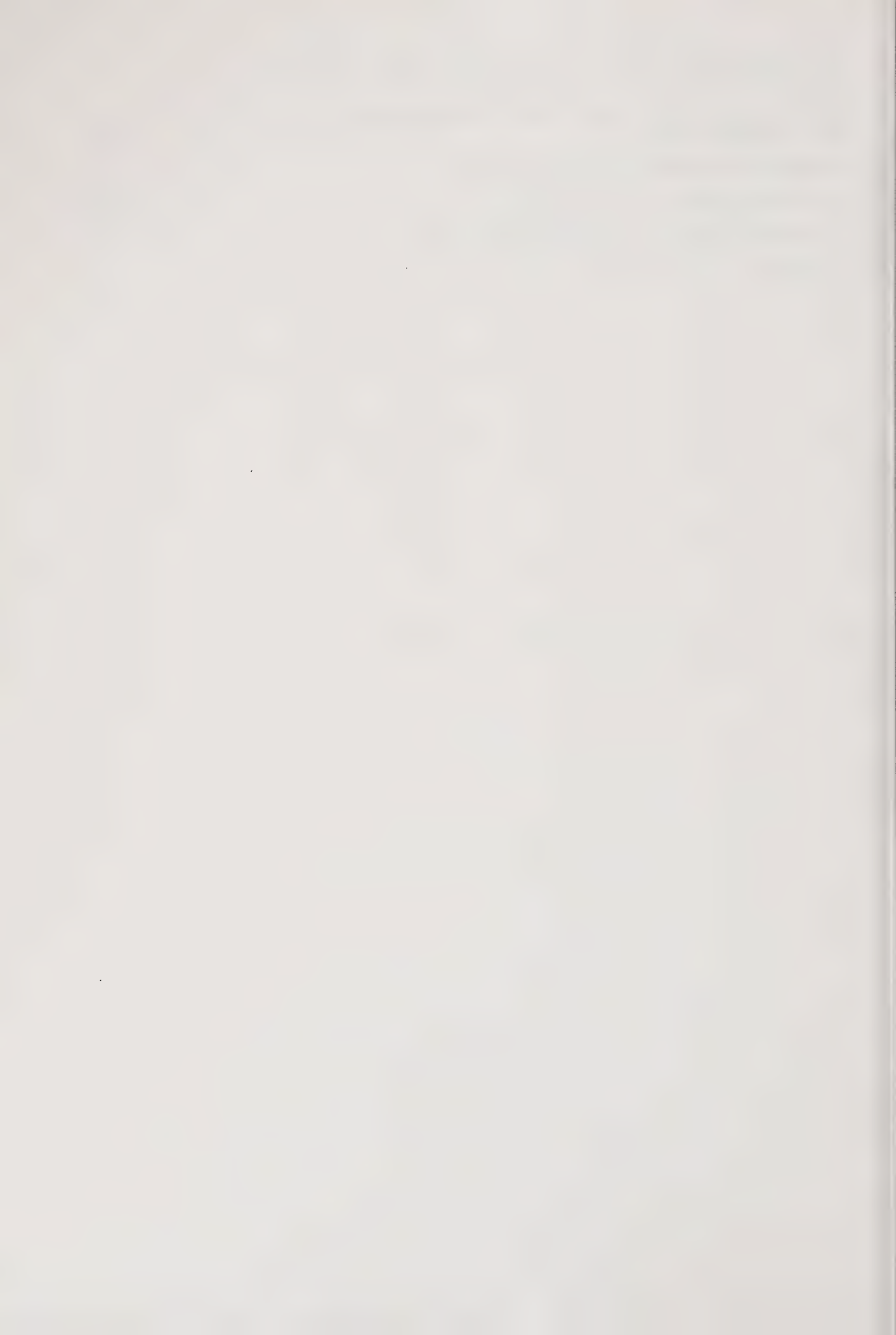
## TABLES

I.	Description of Level of Service (LOS)	8
II.	Estimated PM Peak Hour Level of Service (I-580 and I-680 Interchanges - 1983)	9
III.	Estimated Peak Hour Level of Service, Regional Arterials - 1983	10
IV.	Regional 1980 Reported Trip Length by Purpose and Mode	13
V.	1980 Weekday Trips by Trip Purpose	13
VI.	1980 Vehicle Occupancy by Trip Purpose	14
VII.	1983 Land Use by Zone, and Productions and Attractions	23
VIII.	2005 Land Uses and Productions and Attractions	24
M-1	Link Analysis 2005 AM Peak Traffic Without Las Positas Network Without Las Positas Trips	31
M-1	Link Analysis 2005 PM Peak Traffic Without Las Positas Network Without Las Positas Trips	34
M-2	Link Analysis 2005 AM Peak Traffic Without Las Positas Network With Las Positas Trips	40
M-2	Link Analysis 2005 PM Peak Traffic Without Las Positas Network With Las Positas Trips	43



4-3	Link Analysis 2005 AM Peak Traffic With Las Positas Network With Las Positas Trips	49
4-3	Link Analysis 2005 PM Peak Traffic With Las Positas Network With Las Positas Trips	52
IX.	Mitigating Measures for Existing Arterials	48
X.	Mitigating Measures for New Arterials	64
XI.	Mitigating Measures for Arterial Intersections	66
XII.	Mitigating Measures for I-580 Freeway	70





## INTRODUCTION

This report is a detailed analysis addressing the anticipated transportation-related impacts of the proposed Las Positas development to be located in the Livermore-Amador Valley, north of the City of Livermore in unincorporated Alameda County. The Las Positas Land Company requested approval of an amendment to the County General Plan to permit the development. In June of 1982 a draft environmental impact report was prepared and distributed by the Alameda County Planning Department. Following issuance of the draft document, the project sponsor requested concurrent approval of a rezone for the land area under consideration for a plan amendment. This request led to a recommendation that a revised draft environmental impact report be prepared which would address the project impacts from the plan amendment as well as the rezone application. A revised draft environmental impact report was prepared and issued in March of 1983.

In both the Draft EIR and Revised Draft EIR, the transportation analysis was based primarily on an extrapolation of trends and research conducted for similar large-scale projects. The comments received on the draft document indicated that a more detailed and refined transportation analysis was needed. As a result, this report was prepared. It bases the traffic impacts and resultant mitigating measures on the results of application of a UTPS\* model which forecasted and assigned anticipated traffic generated by the project, as well as other approved and anticipated developments in the area.

## EXISTING CONDITIONS

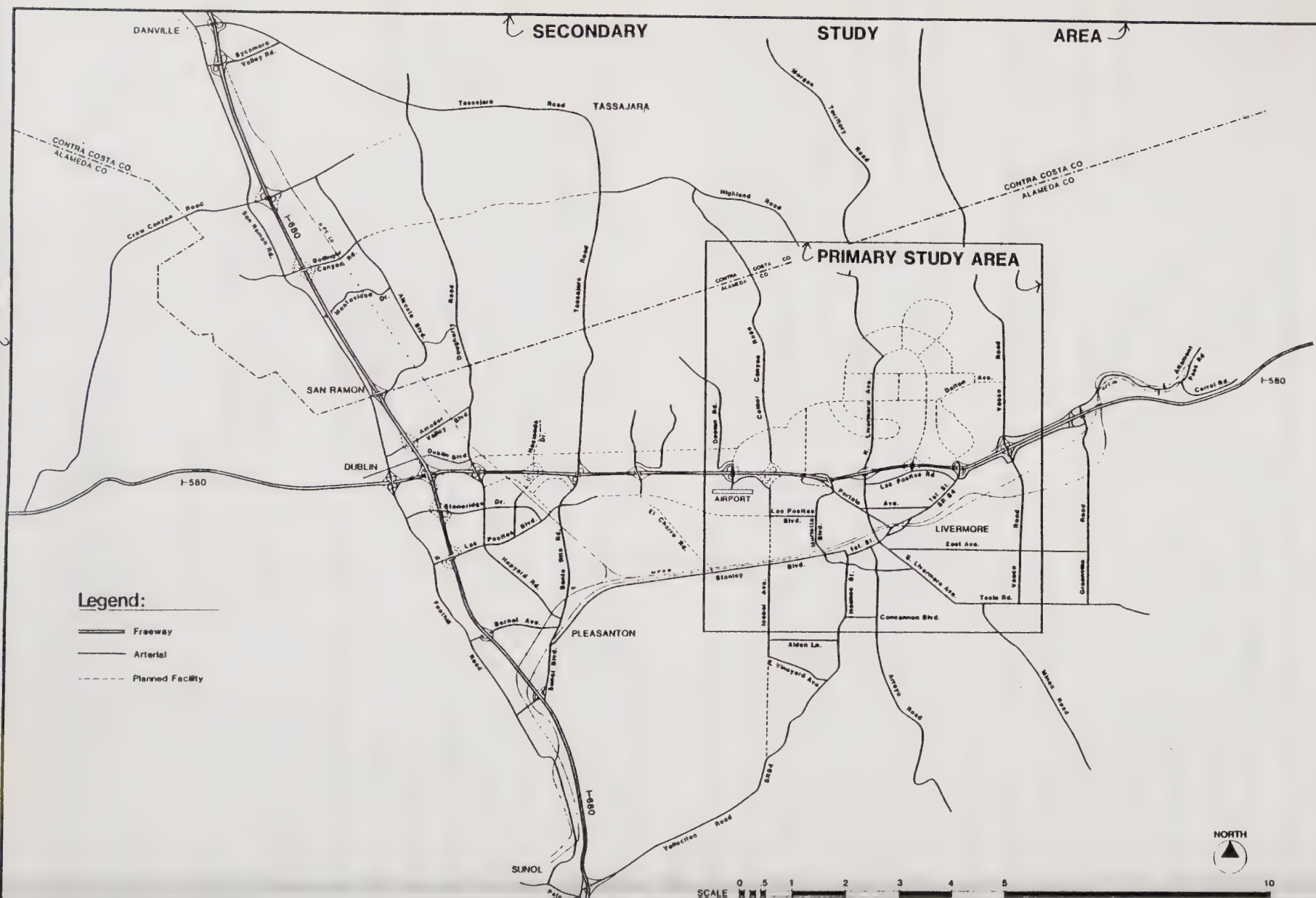
The proposed Las Positas development is located in northern California, approximately 40 miles east of San Francisco, and about 25 miles east and slightly south of Oakland. The project site is north of the City of Livermore in unincorporated Alameda County. Two freeway routes and a series of major arterial highways form the backbone of the highway network system in the valley. A description of the two freeways and key intersections as well as the existing levels of service analysis for key valley intersections are taken from the 1983 TJKM Consultants' study, Tri-Valley Transportation Study and Analysis of the Pleasanton Area Traffic Circulation System.

### Regional Freeway System

The major transportation routes in the valley are Interstate 580, a freeway running east-west south of the project site, and Interstate 680 which runs northwest-southeast about 12 miles west of the site. (See Figure 1.)

---

\*UTPS is a system of computer programs developed by the U.S. Department of Transportation for development of regional traffic forecasts. UTPS is used by most metropolitan planning organizations, including MTC, for transportation planning.





## Interstate 580

Interstate 580 (I-580) is an eight-lane, east-west freeway. Twenty-two miles west of Livermore, I-580 connects the Livermore Valley with Route 17 (Nimitz Freeway), the major north-south route through the cities lining the east shore of San Francisco Bay. Ten miles east of Livermore, Interstate 580 intersects with I-205. Interstate 5, the main north-south freeway connecting the Pacific Coast states, is over twenty-five miles east of Livermore. Interstate 5 connects I-580 to Stockton and Sacramento to the north, and to the west side of the San Joaquin Valley to the south. The following is a general description of the key interchanges along I-580 in the vicinity of the proposed project.

### Vasco Road Interchange

This interchange provides full cloverleaf ramps in the northeast, northwest and southeast quadrants. There is no on-ramp loop from southbound Vasco Road to eastbound I-580 in the southwest quadrant. The result is an eastbound on-ramp operation similar to a diamond interchange and all of the ramp operations are similar to that found at cloverleaf interchanges. A four-lane overcrossing is provided on Vasco Road.

### First Street Interchange

Full cloverleaf ramps are provided in the northwest and southeast quadrants of this interchange. On-ramp loops are not provided in the northeast and southwest quadrants. The result is an off-ramp operation of a cloverleaf interchange with on-ramp operation similar to a diamond-type interchange. A two-lane overcrossing is provided on First Street.

### North Livermore Avenue Interchange

A full diamond interchange is provided at North Livermore Avenue and I-580. The ramp terminals are controlled by stop signs. There is a two-lane undercrossing on North Livermore Avenue, with separate left-turn lanes at the ramp terminal intersections.

### Portola Avenue Interchange

A westbound single lane on-ramp and single lane eastbound off-ramp are provided at this interchange.

### Airway Boulevard Interchange

The interchange between Airway Boulevard and I-580 is what could be referred to as a "folded diamond" interchange. As such, the westbound on-ramp and eastbound

off-ramp are similar to a typical diamond interchange. The westbound off-ramp and eastbound on-ramp are of a loop type. Therefore, all ramp termini intersect Airway Boulevard on the east side. The Airway Boulevard overcrossing carries two lanes of traffic.

As part of the approved Northbluff development plan, the Airway Boulevard interchange would be improved to a modified cloverleaf design by removing the loop in the northwest quadrant and adding a loop in the northeast quadrant.

The City of Livermore is considering two major developments proposed for the north side of I-580 near Airway Boulevard, which may require a new interchange at the Collier Canyon Road/Isabel Avenue alignment. An interchange at this location had earlier been proposed by Caltrans.

#### El Charro Road Interchange

The El Charro Road interchange is of the full diamond design. The ramp termini are stop sign controlled. The El Charro overcrossing provides for two lanes of traffic. At present, the interchange is utilized primarily for truck access to the gravel pits located to the south of I-580.

#### Santa Rita Road/Tassajara Road Interchange

The interchange between Tassajara Road and I-580 provides loop on-ramps and diamond-type off-ramps. The ramp termini intersections are stop sign controlled. A traffic signal is being constructed on the south side of the intersection at Santa Rita Road, Pimlico Avenue and the eastbound ramps. The existing overcrossing has two lanes of traffic on Tassajara Road.

#### Hopyard Road Interchange

A partial cloverleaf interchange is provided at Hopyard Road with loop on-ramps in the northeast and southwest quadrants. A two-lane overpass exists along with stop sign controlled off-ramps.

#### I-680 Interchange

A full cloverleaf interchange is provided at the intersection of I-580 with I-680. Collector roadways independent of the mainlines provide access to all the ramps. This roadway reduces the weaving activity between ramps and the mainline. There are two lanes of traffic in each direction on I-680 south of I-580, and three lanes in each direction north of I-580. Ramp collector roadways are also provided on I-680.

### San Ramon Road/Foothill Road Interchange

A full cloverleaf interchange is provided between I-580 and San Ramon Road/Foothill Road including ramp collector roadways along I-580. Two through lanes and one auxiliary lane are provided in each direction on the local street overcrossing. No major improvements to this interchange are planned.

### I-580 Mainline

In January 1983 the diamond lane operation on I-580 west of San Ramon Road was discontinued. The lanes in this area are now operating unrestricted. Two segments of new mainline roadways are currently under construction. Ultimately, four traffic lanes will be supplied in each direction between San Ramon Road and the SR 238 interchange.

### Interstate 680

Interstate 680 is a four-lane, north-south link of the Bay Area freeway system connecting the Livermore Valley with San Jose, Milpitas, and Fremont to the south, and with Walnut Creek, Concord, and Vallejo to the north. At Vallejo, I-680 connects with Interstate 80. The following is a general description of the geometry at each key intersection along I-680.

#### Diablo Road Interchange

The Diablo Road interchange has a diamond interchange ramp operation except for the northbound on-ramps. The northbound on-ramp operation is similar to the cloverleaf-type design with a loop-ramp provided for the eastbound to northbound movement. The southbound and northbound off-ramp termini are controlled by traffic signals. Four traffic lanes are provided on Diablo Road in the vicinity of the interchange.

#### Sycamore Valley Road Interchange

Off-ramps at the Sycamore Valley Road interchange are of the cloverleaf design with both straight and loop ramps. All on-ramps are of the diamond interchange design. The southbound right-turn off-ramp is stop sign controlled. The northbound right-turn off-ramp is controlled by a yield sign. Access to the northbound on-ramp is controlled by traffic signals. Two traffic lanes are provided on Sycamore Valley Road.

Improvements to the existing interchange ramps are planned at this location. These improvements would allow construction of a 500-car Park and Ride facility and express bus ramps. The Sycamore Valley Road overcrossing would be widened to four lanes.



#### Crow Canyon Road Interchange

A full cloverleaf interchange is provided at I-680/Crow Canyon Road. A ramp collector roadway is provided to reduce weaving operations on the mainline. The southbound off-ramp is being reconstructed at the present time. After construction is completed the ramp terminus will be controlled by a stop sign. Four traffic lanes are provided on the Crow Canyon Road overcrossing with auxiliary lanes for weaving.

Proposed improvements include removing the southbound and northbound loop off-ramps and reconstructing the other existing off-ramps. These improvements are designed to permit construction of two, 250-car Park and Ride lots.

#### Bollinger Canyon Road Interchange (proposed)

Plans exist for the construction of a new I-680 interchange at Bollinger Canyon Road. This interchange would include cloverleaf-style on-ramps and diamond-style off-ramps. A six-lane overcrossing would be provided. Current plans include the construction of two, 250-car Park and Ride lots along with express bus loading areas.

#### Alcosta Boulevard Interchange

There is a full diamond interchange at Alcosta Boulevard. Ramp termini are controlled by stop signs. A four-lane overcrossing is provided along with left-turn pockets at the ramp termini intersections. The adjacent intersection of Alcosta Boulevard and San Ramon Road tends to back up traffic into the interchange during peak traffic periods.

Improvements on the I-680 portion of this interchange are likely to include two additional through lanes and direct connection ramps replacing loops in the southwest and northeast quadrants of the interchange.

#### Bernal Avenue Interchange

Diamond interchange ramps are provided for northbound movements at the Bernal Avenue interchange. A loop off-ramp and diamond on-ramp carry southbound movements. Four through lanes plus left-turn pockets are provided on the Bernal Avenue undercrossing. Ramp termini are stop sign controlled.

#### Sunol Boulevard Interchange

Diamond interchange on-ramps and off-ramps are supplied for northbound traffic on I-680 at Sunol Boulevard, with a southbound loop on-ramp and diamond-style off-ramp. Two westbound through, one eastbound through, and one eastbound left-

turn lane are provided on Sunol Boulevard. All ramp termini are stop sign controlled.

### **Regional Arterial Network**

A number of arterial highways, primarily county roads, supply key transportation linkages in the valley in the vicinity of the proposed project. Greenville Road is the easternmost north-south arterial. It is located along the eastern boundary of the Lawrence Livermore Laboratory and provides access to that facility. Vasco Road, a major north-south inter-county roadway, connects the Livermore vineyards area with I-580 and extends north to the Byron-Brentwood-Oakley area. Livermore Avenue, which extends through the Livermore central business district, includes an interchange with the I-580 freeway. The roadway extends north to connect with Highland Road, which is an east-west facility primarily serving the agriculture and ranching community in southern Contra Costa County. Other roads of local importance are Collier Canyon Road, Hartman Road, Doolan Road, El Charro Road and Fallon Road.

Another route of regional importance in the Livermore area is Vallecitos Road, a two-lane state highway (State Route 84). This roadway connects to the downtown Livermore area via Holmes Street, a four-lane undivided roadway which in turn connects with First Street, and ultimately with I-580.

Between Livermore and Pleasanton, Stanley Boulevard, First Street (Pleasanton), and Sunol Boulevard roughly parallel I-580 and SR 84. Tassajara Road extends from the Pleasanton-Dublin area north into Contra Costa County primarily serving an agricultural area. Dougherty Road (the extension of Hopyard Road in Pleasanton) is a two-lane road that parallels Tassajara and serves as a boundary between the Camp Parks area and the Dublin-San Ramon incorporated limits.

Stoneridge Drive provides east-west service from Foothill Road to Hopyard Road as a four-lane divided facility. Portions of this section are planned to be improved to a divided six lanes in the near future. It is constructed to six lanes divided east from Hopyard Road to West Las Positas Boulevard. West Las Positas Boulevard is currently a discontinuous arterial street providing access to various residential districts of Pleasanton. Hacienda Drive is a major north-south arterial extending from West Las Positas Boulevard to the Southern Pacific Railroad. It will eventually extend to I-580 and be connected with a new major interchange.

The area west of I-680 is mountainous, so few arterials exist between I-680 and the East Bay communities of Fremont, Newark, Hayward, San Leandro and Oakland. San Ramon Road/Foothill Road, paralleling I-680 on the west, is the only significant arterial that provides such a function, connecting with most of the major east-west arterials in the valley.



## Level of Service

The existing levels of service for the interchanges in the area around Las Positas were calculated by TJKM Consultants, authors of the Tri-Valley Transportation Study. In this report, capacity analysis, a technique for measuring the operating performance for either an intersection or a roadway section, was conducted for the interchanges described previously. The technique used to measure level of service follows the method described in Transportation Circular 212, a standard reference used for the analysis of roadway capacity. The term "Level of Service" (LOS) is described in Table I below.

**TABLE I**  
**DESCRIPTION OF LEVEL OF SERVICE (LOS)<sup>a</sup>**

Level of Service	General Description	Volume/Capacity Ratio <sup>b</sup>	Reserve Capacity <sup>c</sup>
A	Free flow	.60	400+ Vehicles
B	Stable flow (slight delays)	.61 - .70	300 - 399
C	Stable flow (acceptable delays)	.71 - .80	200 - 299
D	Approaching unstable flow (tolerable delay)	.81 - .90	100 - 199
E	Unstable flow (intolerable delay - capacity)	.91 - 1.0	less than 99
F	Forced flow (jammed)	(Undefined)	

<sup>a</sup> Level of service is a qualitative measure of the operating performance of a roadway which can include congestion, average speeds, accidents, comfort and convenience, etc. At this time there is no index which combines all of these criteria, so the standard practice in traffic impact studies is to relate level of service to capacity alone. The "capacity" of a road is defined as the maximum volume of vehicles that can pass by any point along a road or through an intersection in one hour considering all conditions including number of lanes, composition of traffic (i.e., the proportion of traffic volume composed of trucks and buses), roadway design characteristics, and type of traffic control (i.e., signals, turning lanes, stop signs, etc.).

<sup>b</sup> V/C Ratio - Applicable in signalized capacity analysis, the "V/C Ratio" is an expression describing the proportion of the full traffic capacity of an intersection used by existing traffic flows. If a signalized intersection can accommodate 2,000 entering cars hourly, and 1,500 cars presently pass through the intersection in the peak hour, the V/C ratio is  $1,500/2,000 = 0.75$ . Volume capacity ratios are taken from Transportation Research Circular 212, Transportation Research Board, January 1980.

<sup>c</sup> Reserve Capacity - Applicable in unsignalized capacity analysis, the "Reserve Capacity" is an expression describing the probable number of added cars from a side street that can enter or cross the traffic stream on the main street. The heavier the volume on the main street, the fewer the cars that can enter or cross that flow from the minor street. Reserve capacities are from Transportation Research Circular 212, TRB, January 1980.



The 1983 estimated peak hour levels of service for the interchanges along Interstate 580 and Interstate 680 are shown in Table II, and for intersections (as counts were available) in Table III. Refer to Figure 1 for locations. LOS ratings included on Tables II and III represent existing traffic conditions and existing freeway and interchange configurations.

**TABLE II**  
ESTIMATED PEAK HOUR LEVEL OF SERVICE  
I-580 and I-680 Interchanges - 1983\*

Interchange	EASTBOUND			WESTBOUND		
	Mainline	On-Ramp	Off-Ramp	Mainline	On-Ramp	Off-Ramp
<u>I-580</u>						
Vasco Road	A	A	A	A	B	A
First Street	A	B	A	A	B	A
North Livermore Ave.	A	A	A	A	A	A
Portola Avenue	B	-	B	B	D	-
Airway Blvd.	B	B	A	B	B	A
El Charro Road	B	B	A	B	B	A
Santa Rita Road	B	B	A	B	B	A
Hopyard Road	B	C	A	B	B	A
I-680	B	D	B	B	C	A
San Ramon Road	B	A	A	B	C	A
<u>I-680</u>						
Diablo Road	B	B	A	B	B	A
Sycamore Valley Road	B	C	A	B	B	B
Crow Canyon Road	B	C	A	B	B	B
Alcosta Blvd.	A	C	A	A	A	A
I-580	C	D	B	C	D	C
Bernal Avenue	B	A	A	B	A	A
Sunol Blvd.	A	A	A	B	A	A

NOTE: Peak hour represents period of maximum flow for each ramp and mainline individually. (For example, LOS shown for a northbound on-ramp may be for the AM peak hour while the LOS for the southbound off-ramp at the same interchange may be for the PM peak hour.)

\*Tri-Valley Transportation Study, TJKM, June 1983

**TABLE III**  
**ESTIMATED PEAK HOUR LEVEL OF SERVICE**  
**Regional Arterials - 1983**

Intersection	AM Peak		PM Peak	
	V/C	LOS	V/C	LOS
Dublin/San Ramon	.82	D	1.00	F
Stoneridge/Foothill	.41	A	.43	A
Las Positas/Foothill	.35	A	.35	A
Stanley/First	.49	A	.52	A
Las Positas/Hopyard	.40	A	.60	A
Stoneridge/Hopyard	.50	A	.63	B
Dublin/Dougherty	.62	B	1.00	F
Las Positas/Santa Rita	.41	A	.50	A
Highland/Tassajara	.07	A	.07	A
Highland/Collier Canyon	.05	A	.06	A
Tassajara/Sycamore Valley	.48	A	.67	B
Tassajara/Dougherty	.10	A	.13	A
Stanley/Holmes	.64	B	.68	B
Livermore/Portola	.47	A	.67	B
Livermore/First	.59	A	.52	A
Greenville/Tesla	.09	A	.08	A
Tesla/Vasco	.13	A	.16	A
Tesla/Mines	.16	A	.18	A
Greenville/East	.12	A	.17	A

### Historic Traffic Growth

Employment and population in the area have grown at annual rates of 4% and 2.9%\*, respectively, in the 1970-1980 decade. Compared to these, traffic volume growth rates are significantly larger.

Traffic counts provided by the Alameda County Public Works Department and Caltrans, the California Department of Transportation were used to calculate historic traffic

\*Association of Bay Area Governments (ABAG), Projections '83.

growth rates. (Twenty-four-hour traffic volumes for the study area are shown in Figure 2.) Interstate 580 has shown a 4% annual increase in traffic volumes from 1970-1980 just east of the Las Positas site, and a 4.7% annual growth rate on I-580 just east of I-680. On I-680, south of I-580, the annual traffic volume growth rate has been 5.1%. A higher annual growth rate of 6.3% was observed on Portola Avenue.

### **Trip Characteristics**

In 1981 the Metropolitan Transportation Commission (MTC) conducted a travel survey which, in part, documented trip-making behavior including information related to trip length, origins and destinations, car occupancy and mode of travel for the nine-county Bay region (1980 Regional Travel Characteristics, Working Paper 8, 1981, Metropolitan Transportation Commission).

Based on the results of the survey, the regional weekday trip duration by purpose and mode, shown in Table IV, was calculated. On an average weekday, the survey respondents reported an average trip length of 19 minutes for total trips; work trips were the longest at 27 minutes and shopping trips the shortest at 15 minutes. By mode, average public transit trips took 47 minutes. The shortest trip was made by walkers who spent an average of 13 minutes for all trips.

The 1981 survey also addressed weekday trip purpose by origin and by destination for each county. The 1981 survey related the results to 1980 census households in order to represent 1980 trip patterns. According to the survey, Alameda County is the second highest, next to Santa Clara County, in the number of trip productions and attractions in the nine-county area. The survey shows a total of 3.7 million weekday trips produced and 3.6 million weekday trips attracted to Alameda County during 1980. In Contra Costa County, the survey showed a 1980 total of 2.2 million weekday trip productions and 2.0 million weekday trip attractions. (See Table V.)

The MTC survey also was used to calculate average vehicle occupancy by county. In general, car occupancy for work trip productions is the lowest among trip purposes at a region-wide average of 1.13 persons/car. Occupancies for non-home-based trips were found to be higher, averaging 1.25 persons/car on a regional basis. The data compiled for Alameda County and Contra Costa County are shown in Table VI.

Of total trips, the survey showed the transit share to be 7% for Alameda County and 4% for Contra Costa County. The highest transit use is assumed to be concentrated in the more densely populated communities along east San Francisco Bay that are well served by BART and AC Transit.






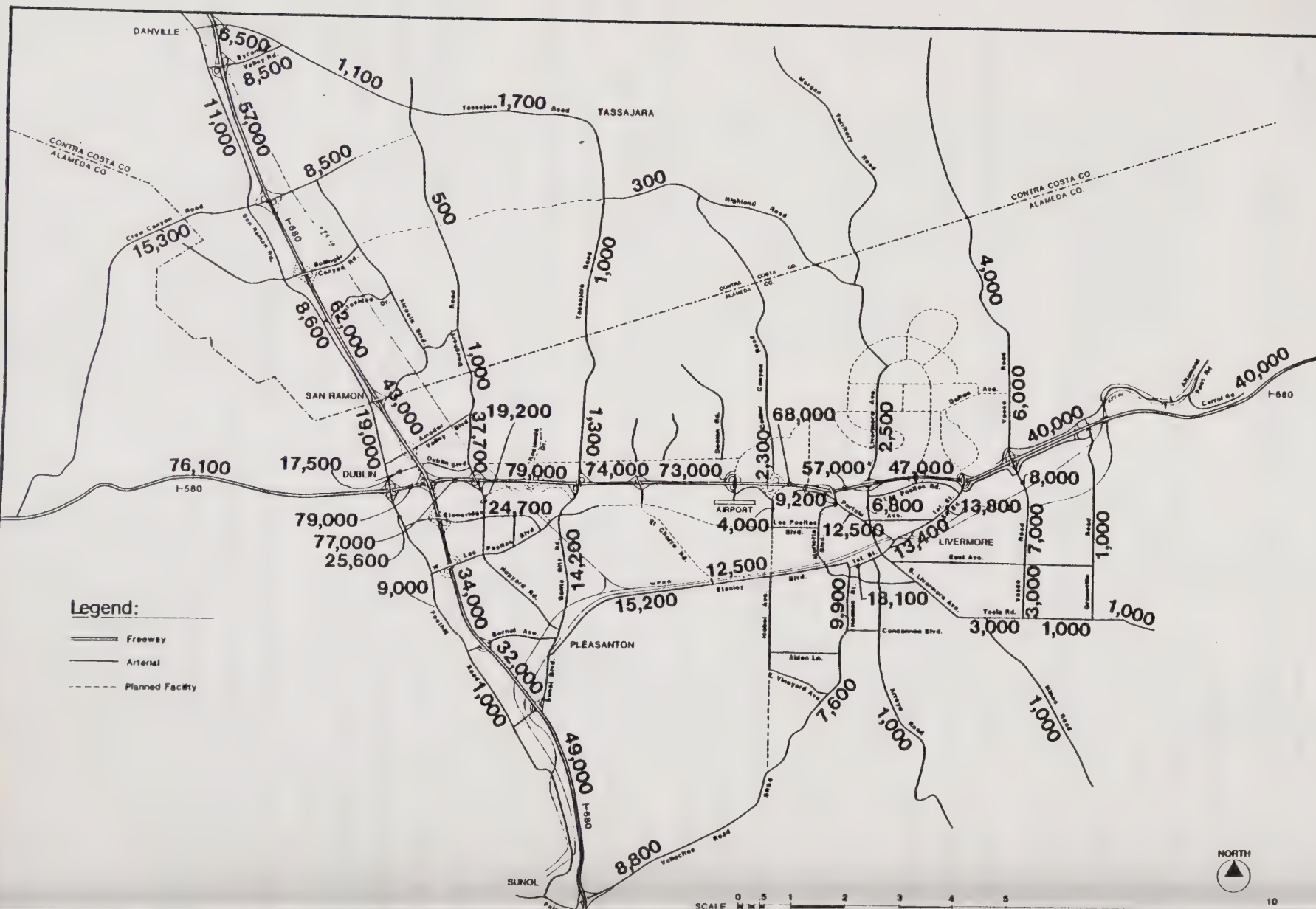
# Las Positas

## Transportation Analysis

1983 ADT - EXISTING VOLUMES

### Legend:

-  Freeway
-  Arterial
-  Planned Facility



SCALE 0 0.5 1 2 3 4 5

**TABLE IV**  
REGIONAL 1980 REPORTED TRIP LENGTH BY PURPOSE AND MODE  
(in minutes)

Mode	Home-based Work	Home-based Shop	Home-based Soc/Rec	Home-based School	Non- Home-based	Total
Vehicle Driver	24.0	14.1	18.7	20.0	16.2	18.0
Vehicle Passenger	28.1	16.1	18.3	14.8	16.9	18.1
Vehicle Persons	24.5	14.5	18.6	17.2	16.3	18.0
Transit Rider	49.9	43.8	58.3	42.4	42.1	46.6
Commuters	27.5	15.7	20.2	23.4	17.6	20.2
School Bus	0.0	0.0	0.0	28.8	0.0	28.8
Bike	12.1	12.9	12.7	14.3	10.7	12.5
Other	17.3	12.5	16.7	14.4	17.7	15.8
TOTAL	26.6	15.4	19.2	20.5	16.7	19.3

**TABLE V**  
1980 WEEKDAY TRIPS BY TRIP PURPOSE

Mode	Home-based Work	Home-based Shop	Home-based Soc/Rec	Home-based School	Non- Home-based	Total
<u>Alameda County</u>						
<u>Productions</u>						
Thousands of Trips	785	962	532	410	985	3,673
Percent of Total	21.4%	26.2%	14.5%	11.2%	26.8%	100.0%
<u>Attractions</u>						
Thousands of Trips	743	970	518	416	999	3,645
Percent of Total	20.4%	26.6%	14.2%	11.4%	27.4%	100.0%
<u>Contra Costa County</u>						
<u>Productions</u>						
Thousands of Trips	436	638	330	265	530	2,198
Percent of Total	19.8%	29.0%	15.0%	12.1%	24.1%	100.0%
<u>Attractions</u>						
Thousands of Trips	344	591	312	253	529	2,029
Percent of Total	17.0%	29.1%	15.4%	12.5%	26.1%	100.0%

**TABLE VI**  
**1980 VEHICLE OCCUPANCY BY TRIP PURPOSE**  
 (persons/car)

	Home-based Work	Home-based Shop	Home-based Soc/Rec	Home-based School	Non- Home-based	Average
<u>Alameda County</u>						
Productions	1.144	1.290	1.734	2.150	1.261	1.32
Attractions	1.127	1.303	1.754	2.165	1.261	1.32
<u>Contra Costa County</u>						
Productions	1.115	1.286	1.670	2.400	1.276	1.32
Attractions	1.090	1.276	1.694	2.609	1.281	1.32

### **Transportation System Management**

There are several transportation system management measures currently in operation in the vicinity of the Las Positas project which, to some degree, improve the operation of the regional system. In the Bay area, 50% employee participation in ride-sharing has been reported for several organizations including the Lawrence Livermore Laboratory and the Caltrans District 4 offices. The MITIGATING MEASURES section of this report will address the possibilities of expanding these and implementing other TSM measures to further improve the system.

### **Transit**

#### Bay Area Rapid Transit Rail System (BART)

The Bay Area Rapid Transit District is a three-county, 75-mile rail rapid transit system with 34 stations. Of the 12 stations in Alameda County, the two nearest in time to the Livermore-Amador Valley population area are the Bay Fair Station in San Leandro and the Hayward Station.

BART has contracted with AC Transit to provide regional transit service in the I-580 corridor between Livermore and the BART stations in Hayward and San Leandro. Approximately 50 round-trip buses operate each weekday in the corridor, with peak-hour headways between 15 and 30 minutes. Peak-hour travel time between Livermore and the BART stations is approximately 55 minutes. Currently, 3,000 weekday riders are carried between the valley and the BART stations on the AC Transit buses.



### Greyhound Bus Lines

Greyhound provides inter-city bus services between San Francisco and Stockton, and between Stockton and San Jose with stops in the valley. One bus operates through the Livermore area during peak hours.

### City of Livermore RIDEO System

The City of Livermore operates the only municipal-type transit system in the Livermore-Amador Valley. The RIDEO system consists of six routes operating 15 hours per day on weekdays and 8 hours on Saturdays. The service provides intra-city transit services and connections to the AC/BART feeder service. In addition to this fixed route system, Livermore operates a paratransit system for the convenience of senior citizens and the handicapped.

### Other Bus Companies

Sierra Lines of Concord, California is a subscription service with collection points in Contra Costa County for trips to the Lawrence Livermore Laboratory.

### Livermore-Pleasanton BART Extension Study

Several studies were undertaken in the mid-1970s to identify potential extension routes throughout the BART District. One of these studies was an investigation of extension of the BART system to the Livermore-Pleasanton area. In 1980, a locational and phasing plan was adopted by the BART Board of Directors, which established the priority rating for the various extensions planned in the Bay Area. The first segment of the Livermore extension (reaching the Dublin area) is shown for the 1985 to 1990 period, with completion to Livermore scheduled for 1995 to 2000.

### BART Express Bus Service

The BART Board of Directors recently adopted the "BART Express Bus Plan 1981/82 - 1985/86." The proposed plan provides a blueprint for improving both the efficiency of the express bus system and its effectiveness as a means of access to the BART rail system. The proposed plan calls for streamlining existing services into a freeway express service that connects the rail system with BART Bus/Auto Park and Ride stations located at possible future rail stations. It is anticipated that the improved bus service would attract new rail patrons, generate new rail revenue, improve rail access, and function more as an extension of the BART system.

### **Air**

Livermore is approximately equidistant from two major regional airports, the Metropolitan Oakland International Airport and the San Jose Municipal Airport. In 1979, the

number of passengers using the Oakland Airport was 2,772,000. In the same year, 3,617,000 passengers used the San Jose Municipal Airport.

The Livermore Municipal Airport, a general aviation facility which began operation in 1972, had 209,000 operations in 1979. The facility is approximately 3 miles southwest of the Las Positas project area.

### **Rail**

Southern Pacific (SP) and Western Pacific (WP) rail lines extend through the Livermore-Amador Valley connecting with the statewide network and provide Livermore with a daily freight service. Some of the major industries that SP and WP serve are steel fabrication plants and sand and gravel batch plants.

## **TRANSPORTATION IMPACTS**

### **Approach**

The analysis in this report was completed to answer some fundamental questions: What are the traffic impacts of Las Positas and what is needed to eliminate or at least reduce these impacts? To answer these questions, forecasts with and without Las Positas were developed considering the factors which influence traffic characteristics--future population and employment, the location and density of population and employment, the traffic capacity of the existing transportation system, and the added capacity made possible by planned improvements to the system that are acceptable to the community.

Many factors can be forecast far into the future through mathematical equations as will be explained below, but some factors cannot. To measure the traffic impacts of any project the analyst needs to know first what will exist without the project. In the short term, this is easily accomplished by a simple visit to the site and also interviews with public works and planning officials. In the long term, many of the factors, used in assessing site-specific, short-term impacts are unknown and must be forecast. Therefore, two levels of analysis were conducted, one for Phase I and the other for eventual project build-out in the year 2005. It should be noted here that the analysis was conducted for the "worst case." This means that Las Positas residents and employees were added on top of the 2005 population and employment forecasts even though it is much more likely that most, if not all, Las Positas residents and employees would be a part of those forecasts. Additionally, no allowance was made for the effects of carpooling and transit use even though they could account for a 10% or greater reduction in future traffic volumes forecast in this analysis.



The process of forecasting traffic impacts to 2005 differs from short-term analytical methods because the potential combinations of possible street improvements become infinite in the absence of an adopted 2005 land use and transportation plan. The analysis in this report has overcome these difficulties by resorting to more general assumptions: instead of developing specific new roadway alignments, "corridors with some added lanes were assumed" (locations were not); intersections and existing route improvements were also generalized into a need for "added lanes of capacity or added approach lanes" rather than details of specific lanes; and finally, "added lanes" did not necessarily have to be constructed on any specific route--rather, they might be added through the upgrading of local access or collector routes.

The development of Las Positas as proposed would generate demands on three transportation systems: roadways within the development, the freeway system, and the Livermore Valley street network. This analysis addresses increases in automobile traffic on these roadway systems.

The transportation analysis utilized both a primary and secondary study area. The primary study area included all development within Las Positas, all on-site roadways, and I-580 and the five freeway interchanges between Vasco Road and Airway Boulevard. The secondary study area roads include I-580 to the west, I-680 from Danville to Sunol, the major roadways connecting Las Positas with Livermore and Pleasanton, and roads in the area to the southwest along State Route 84. (See Figure 1.)

The traffic characteristics of the existing arterial and freeway system in the primary and secondary study area were inventoried by Wilsey & Ham in August 1983. The number of lanes for through traffic by direction on routes between intersections, and speed limits were noted. Distances between intersections were scaled from maps. Intersection characteristics were inventoried with respect to traffic control devices (i.e., signals, stop or yield signs), number of approach lanes for through traffic, and exclusive lanes for left or right turns. These basic data were needed to develop a traffic forecasting model, and to calculate capacity and the level of service (LOS) for each highway facility under review.

As explained above, in order to evaluate the effect of Las Positas development on the regional transportation network, it was necessary to establish (or "forecast") year 2005 baseline traffic that would be expected to occur without the addition of Las Positas traffic. Improvements that are both committed and under consideration regardless of the Las Positas proposal were added to the 1983 base year network in order to establish



a 2005 baseline condition. These improvements will be needed in the region because of its normal growth in population and employment. Costs will be attributable to normal sources of revenue. Such costs could be avoided only if growth is prevented. The traffic expected to be generated by Las Positas (assuming full buildout by 2005) was then added to the baseline traffic and the additional impacts on base year traffic operations were calculated.

The improvements assumed for the 2005 baseline system and the system assumed for Las Positas are listed and described in the discussion of alternatives. It should be remembered that these improvements are, on the whole, assumptions rather than publicly accepted improvements.

### **Traffic Forecasting Process (General Discussion)**

A generalized account of the common procedures used in traffic forecasting is presented below as well as a discussion of the specific analysis conducted for this project. Since the process of forecasting and evaluating traffic is complicated, a Technical Appendix to this supplement to the DEIR has been prepared to detail the data and quantitative techniques employed in this analysis.

Traffic forecasting involves several steps. These include: analysis of land use, trip generation, preparation of a trip table, assignment of traffic, model calibration, and finally traffic forecasting.

#### Land Use Analysis and Trip Generation

Existing and forecast population and employment data are used to determine estimates of future development and land use patterns. These data are usually disaggregated into small geographical areas, referred to as traffic analysis zones (TAZ's).

A relationship is established between land use (usually households and employment by type) and the number of trips "produced" or "attracted" each day by that use. This is the trip generation function of the model.

#### Trip Distribution

Once estimates are made of the trip productions and attractions on an average day for any given traffic analysis zone (which may be as small as a few city blocks), further estimates must be made as to where these trips will go. For example, trips which are produced at home are attracted to zones with jobs, shopping, parks, schools or the homes of friends. The separation in terms of travel time between a zone in which trips are produced and a zone to which these trips are potentially attracted determines how many trips will be made between the two zones. The closer the zones are to each

other, the more likely it is that trips produced in one zone will travel to the other and back. For example, a greater proportion of the trips produced in Livermore will go to Pleasanton for work and shopping than trips produced in San Mateo.

One model commonly used to estimate how trips are distributed among the zones is called the "gravity model." There are a number of computer programs that can be used to create this model. It is so-called because the probability of a trip being made between two zones decreases roughly in inverse proportion to the square of the distance (or travel time separation) between the zones, much as is the case with the gravitational attraction between objects in space. The output from this step is a "trip table" which is a matrix of the number of trips from each zone to each other zone in the study area.

#### Trip or Traffic Assignment

A computer representation of the highway and transit system is used to describe the distances and travel speeds between intersections throughout the area. An algorithm is used by the computer to calculate the best route between each pair of zones. The trips in the trip table are "assigned" to the highway and transit systems, and the result is a listing of traffic volumes by direction on each street between intersections.

#### Model Calibration

The model output is calibrated to approximate real traffic counts, for either screenlines (which are imaginary lines dividing major areas) or for individual streets. The counts estimated by the computer are compared to actual traffic counts. Model variables are then adjusted to make the model count estimates approach the actual counts.

#### **Forecast of 2005 Travel Conditions (Without and With Las Positas)**

The steps used in the analysis to project traffic in the year 2005 without and with Las Positas are described below. Many changes from the assumptions used here for future transportation policies and facilities, land use patterns, and transit usage could occur in the next 20 years which would obviously affect the outcome. Therefore, it should be understood that the long-range planning conclusions from this traffic study are subject to modification should a comprehensive traffic plan be developed by the county and cities in the Livermore Valley.

#### Land Use Analysis


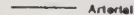
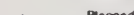
Both existing and year 2005 land use data are based directly upon Projections '83 from the Association of Bay Area Governments (ABAG). The ABAG 1983 population and employment data for the study area were disaggregated by referencing the TJKM Tri-Valley study data for 60 smaller analysis zones. (See Figures 3a and 3b.) The TJKM

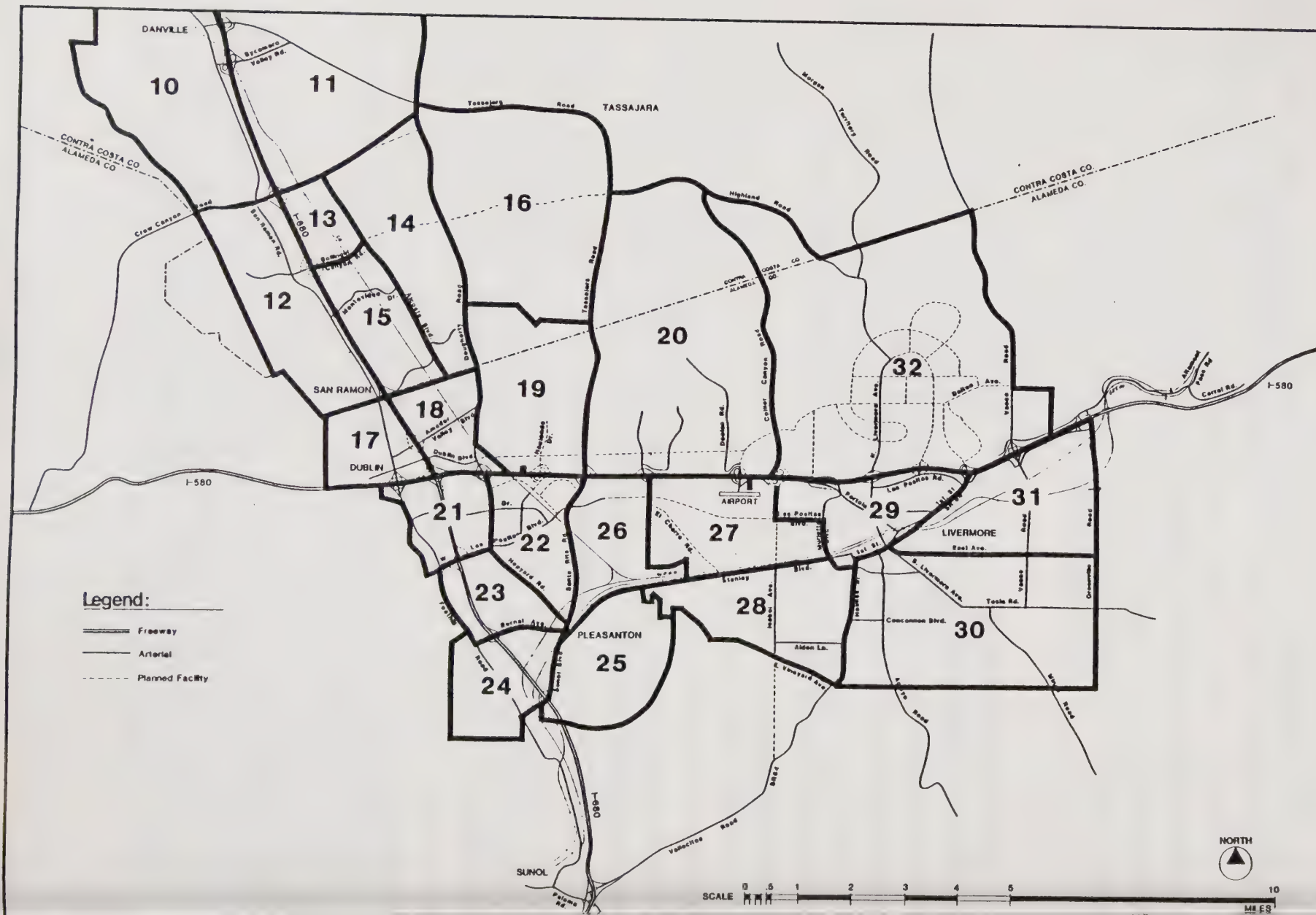
# Las Positas

## Transportation Analysis

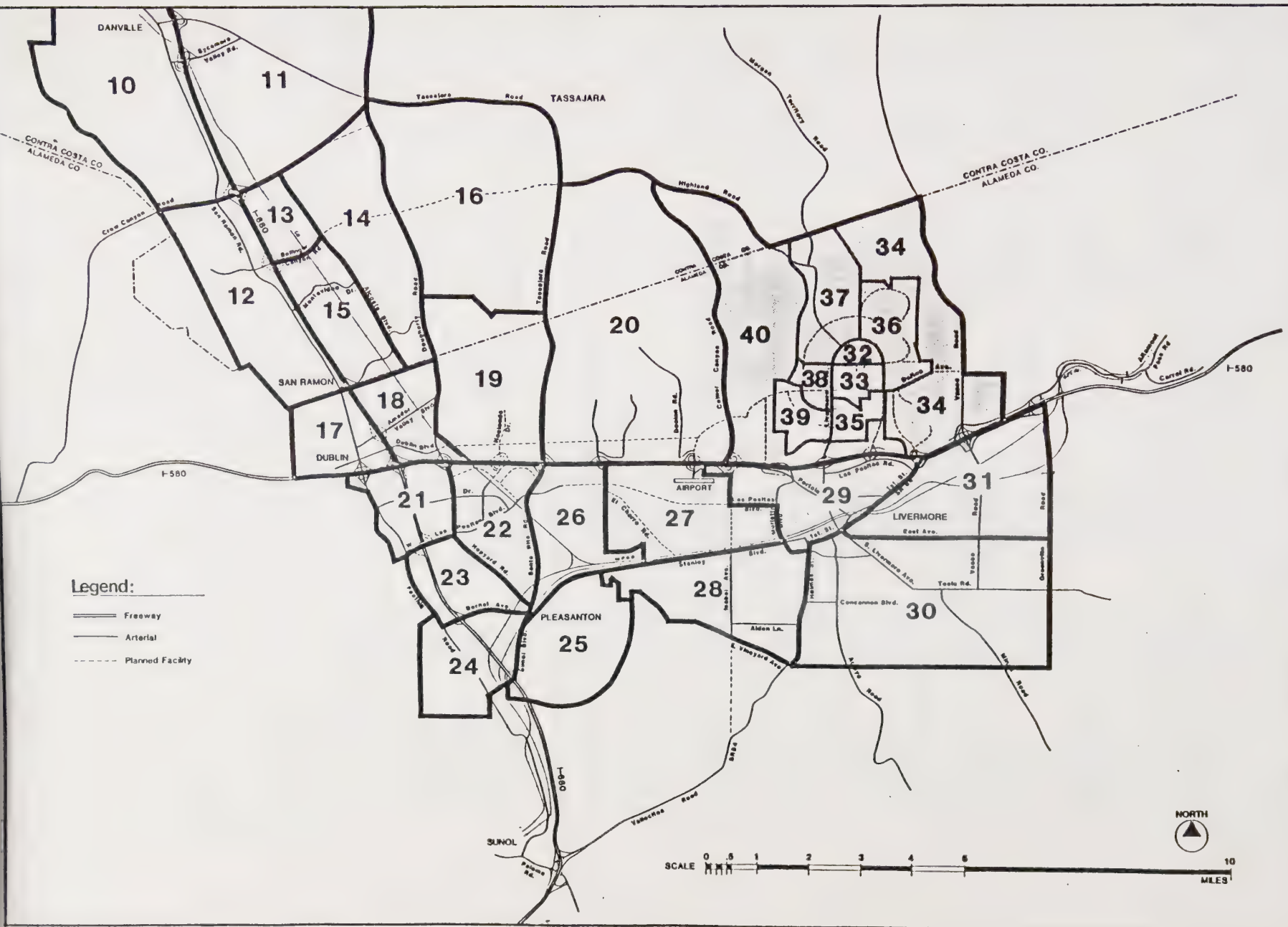
## STUDY AREA TRAFFIC ZONES

### Legend:

-  Freeway
-  Arterial
-  Planned Facility







study forecasted anticipated future development in the area, and Wilsey & Ham adjusted these forecasts for each analysis zone to conform to ABAG totals. Table VII shows the 1983 land use derived from ABAG, in terms of households and employment. Year 2005 data were extrapolated from year 2000 ABAG forecasts for five city "spheres of influence." Employment totals for both 1983 and 2005 were split into retail and other employment to estimate trip generation more accurately. Table VIII shows the households and employment data for 2005.

### Trip Generation

In evaluating the impacts of traffic flow for this project, the total number of daily trips generated did not provide for an adequate analysis. Freeways and major roadways are most heavily loaded during the AM and PM peak hours, generally 7:00 AM to 8:00 AM and 4:30 PM to 5:30 PM. For this situation, in addition to an analysis of total daily trips, an analysis of AM and PM peak-hour traffic volumes and peak-hour roadway capacity was conducted.

The calculations of trip productions and attractions for this project are shown in Table VII for 1983 and Table VIII for 2005. The coefficients used in the productions and attractions equations control the numbers of trips which the model will assign to the road network. The Caltrans 13th Progress Report on trip ends generation research counts, dated June, 1981, was used to provide controls on the coefficients so that the trip productions and attractions used for the 1983 and 2005 calculations of vehicle volumes would be based upon local area data.

The relationship between productions and attractions on the one hand and trip ends on the other is shown in the equations below.

$$\begin{array}{lcl}
 \text{Trip productions} & = & 5.82 \text{ (households)} + 4.33 \text{ (retail employ.)} \\
 \text{Trip attractions} & = & \frac{1.68}{7.50} \text{ (households)} + \frac{14.67}{19.00} \text{ (retail employ.)} + \frac{3.3}{3.3} \text{ (other employ.)} \\
 \text{Total of coefficients} & & 
 \end{array}$$

The coefficients for these equations would normally be derived from a regional travel model based on data collected in a home interview survey of travel characteristics. Unfortunately, such a model and data are not available, nor could they be prepared for this analysis without the expenditure of many months of time that should be the beginning phase of a regional comprehensive transportation plan.

The coefficients shown in the equations above were derived during a recent transportation planning study for Renton, Washington, an industrial suburban community near

**TABLE VII**  
1983 LAND USES, AND PRODUCTIONS AND ATTRACTIONS\*

Sphere of influence	1 TAZ	2 Retail Employ- ment	3 Other Employ- ment	4 House- holds	5 <sup>1</sup> Total Attrac- tions	6 <sup>2</sup> Total Produc- tions
DANVILLE	10	388	1,353	2,471	14,308	16,061
	11	997	3,479	6,481	36,995	42,036
Subtotal		<u>1,385</u>	<u>4,832</u>	<u>8,952</u>	<u>51,303</u>	<u>58,097</u>
SAN RAMON	12	148	585	2,207	7,809	13,486
ALAMO	13	212	5,605	916	23,145	6,249
	14	100	0	576	2,435	3,785
	15	1,100	0	6,818	27,591	44,444
	16	126	502	153	3,762	1,436
	19	253	1,004	981	8,673	6,805
	20	169	669	183	4,994	1,797
Subtotal		<u>2,108</u>	<u>8,365</u>	<u>11,834</u>	<u>78,409</u>	<u>78,002</u>
DUBLIN	17	2,499	2,398	2,157	48,197	23,374
	18	948	2,598	2,461	26,615	18,428
Subtotal		<u>3,447</u>	<u>4,996</u>	<u>4,618</u>	<u>74,812</u>	<u>41,802</u>
PLEASANTON	21	1,587	725	1,837	28,760	17,563
	22	565	5,601	3,306	32,326	21,687
	23	112	328	2,575	7,051	15,471
	24	112	328	683	3,873	4,460
	25	84	246	2,849	6,830	16,945
	26	335	987	802	9,519	6,118
Subtotal		<u>2,795</u>	<u>8,215</u>	<u>12,052</u>	<u>88,359</u>	<u>82,244</u>
LIVERMORE	27	541	3,560	605	20,701	5,864
	28	200	0	3,046	8,051	18,594
	29	754	5,471	3,429	34,876	23,222
	30	552	339	3,774	15,557	24,355
	31	431	7,759	1,901	34,527	12,930
	32	100	0	1,508	4,000	9,210
Subtotal		<u>2,578</u>	<u>16,949</u>	<u>14,263</u>	<u>117,712</u>	<u>94,175</u>
Study Area TOTAL		12,313	43,357	51,719	410,595	354,320

\*Note that productions and attractions are defined as the home and non-home ends respectively of home-based trips. They are not synonymous with origins and destinations.

<sup>1</sup> Column 5 is calculated as follows: 1.68 (Col. 4) + 14.67 (Col. 2) + 3.3 (Col. 3)

<sup>2</sup> Column 6 is calculated as follows: 5.82 (Col. 4) + 4.33 (Col. 2)

The coefficients used in these calculations are discussed in the Technical Appendix.



TABLE VIII

## 2005 LAND USES, AND PRODUCTIONS AND ATTRACTIONS\*

Sphere of influence	1 TAZ	2 Retail Employ- ment	3 Other Employ- ment	4 House- holds	5 <sup>1</sup> Total Attrac- tions	6 <sup>2</sup> Total Produc- tions
DANVILLE	10	1,318	3,359	2,690	34,939	21,363
	11	3,387	8,636	9,290	93,793	68,734
Subtotal		4,705	11,995	11,980	128,732	90,097
SAN RAMON	12	602	1,608	2,539	18,403	17,384
ALAMO	13	863	15,517	916	65,405	9,068
	14	407	0	1,807	9,006	12,279
	15	4,447	0	7,285	77,916	61,784
	16	828	1,288	4,589	24,107	30,293
	19	1,030	2,772	981	25,906	10,169
	20	688	1,820	183	16,406	4,044
Subtotal		8,895	23,005	18,300	237,149	145,021
DUBLIN	17	3,759	2,896	2,938	69,637	33,376
	18	1,426	3,269	3,572	37,708	26,964
Subtotal		5,185	6,165	6,510	107,345	60,340
PLEASANTON	21	3,152	6,722	2,342	72,357	27,279
	22	3,405	21,197	3,716	126,144	36,371
	23	227	1,594	3,551	14,556	21,650
	24	212	1,483	2,558	12,301	15,806
	25	2,389	746	3,764	43,832	32,251
	26	485	4,838	6,629	34,217	40,681
Subtotal		9,870	36,580	22,560	303,407	174,038
LIVERMORE	27	1,349	7,057	883	44,561	10,980
	28	499	300	3,850	14,778	24,568
	29	2,250	9,302	4,781	71,736	37,568
	30	1,377	1,090	9,404	39,596	60,694
	31	1,075	14,601	6,324	74,578	41,460
	34	50	0	1,400	3,086	8,365
	40	50	0	108	915	845
Subtotal		6,650	32,350	26,750	249,250	184,480
Study Area Subtotal		35,305	110,095	86,100	1,025,883	653,976
LAS POSITAS	32*	793	2,636	1,767	23,301	13,718
	33	211	10,858	493	39,755	3,783
	35	211	0	1,685	5,926	10,720
	36	264	0	4,018	10,623	24,528
	37	475	0	7,342	19,303	44,787
	38	106	0	1,816	4,606	11,028
	39	0	6,641	879	23,392	5,116
Subtotal		2,060	20,135	18,000	126,906	113,680
Study Area TOTAL		37,365	130,230	104,100	1,152,789	767,656

\*also a part of Livermore

<sup>1</sup> Column 5 is calculated as follows: 1.68 (Col. 4) + 14.67 (Col. 2) + 3.3 (Col. 3)<sup>2</sup> Column 6 is calculated as follows: 5.82 (Col. 4) + 4.33 (Col. 2)

Seattle. The regional travel model was developed by the Puget Sound Council of Governments, based on the regional agency's survey of travel characteristics. For modeling purposes, the Renton and Livermore areas were judged similar in travel behavior. The use of Caltrans trip generation figures provides an overall control of the coefficients to ensure compatibility with local conditions.

The total of coefficients for households, 7.5, was the average trip generation rate for households in the study area. The mix of low and high density housing units, with their trip generation rates varying from 5.1 to 9.5 vehicle trips on an average week day, made the 7.5 average trip ends per household per weekday figure a reasonable estimate.

#### Trip Distribution or Trip Table

The computer programs used were the UTPS (Urban Transportation Planning System) set of programs. Developed for regional transportation models by the U.S. Department of Transportation, this computer software is considered standard for transportation planning in urban areas in the United States.

Because an existing trip table was not available, a gravity model distribution of trips between zones was developed using four kinds of data: zonal land use activity, trip generation rates, zone-to-zone travel times, and existing counts. A more detailed description of UTPS and its modeling process is contained in the Technical Appendix.

#### Trip or Traffic Assignment

The UTPS path builder program was used to identify the "best" paths for each zonal trip interchange. The initial assignment of traffic was based upon free speeds, but as traffic was incrementally added to the system, speeds on the more popular routes were reduced through a simulation of the effects of congestion, and new "best" paths were determined. The DEIR of March 1983 for the Las Positas project made an assumption that, of all the vehicle trips that had an origin or a destination in the project area, 40% of these trips would be made completely within the area, and 60% would cross the project boundary. This current analysis has shown that only 30% of all trips starting or ending in the project area will stay completely in the area, and 70% will cross the boundary.

The assignment of vehicle traffic using the assignment process can produce uneven traffic volumes in certain places because of the traffic analysis zone structure and the position of the centroids of those zones. There are certain links in the study area network that have been assigned excessive traffic volumes because of this situation. Those links are marked with an asterisk\* in the link analysis tables and the number of lanes indicated for those marked links would be less than shown in the table. In each



### Model Calibration

The model developed for this report had a mean error of 11.8% in estimating 1983 trip attractions. This level of error is quite small, and represents a well-calibrated model. The calibration process concentrated on the freeways and arterials in the project area, and thus errors were minimized in the immediate area. The traffic impacts of the project are, therefore, most reliable on the facilities near Las Positas. On more distant arterials, where the impacts are less, the error tends to be higher. The actual results of the calibration are shown in Figure 4 of the Technical Appendix.

### **Descriptions of Scenarios Analyzed**

In order to determine the traffic impacts of growth in the study area, the vehicle trips expected in 2005 in the study area -- with and without the trips due to the Las Positas project -- were assigned to two highway networks. The first network was designed to accommodate the trips in 2005 without the Las Positas trips at a traffic LOS D or better on all links of the network. This is referenced as the "without" network. The second network was designed to accommodate the trips in 2005 with the Las Positas trips at LOS D or better on each link. This is called the "with" network.

In addition to testing the 2005 trips without Las Positas on the "without" network, and the 2005 trips with Las Positas on the "with" network, a third test was made by assigning the 2005 trips with Las Positas to the "without" network. This procedure shows where Las Positas traffic has major impacts on the 2005 highway network that is designed to handle all growth except for Las Positas.

The two networks referenced above were developed through a series of traffic assignments in which new links and the numbers of lanes on links were varied in order to achieve a suitable level of service of traffic operations under peak-hour travel conditions. The intermediate work is not reported here, only the final networks that are able to accommodate the predicted traffic at the required level of service.

Both the AM and PM peak hours were evaluated; however, it is the PM peak hour that controls the maximum requirements on the highway network. Unless otherwise noted, it is the PM peak-hour traffic volumes that are used to calculate lane requirements.

### **Traffic Impacts Within Scenarios**

The patterns of traffic flow in the study area are dominated by the high vehicle volumes on I-680 and I-580. Both interstates have many interchanges with surface arterials. Traffic on I-580 in the area has historically increased faster than either population or employment. Between 1970 and 1980, traffic volumes on I-580 increased



at 4.7 percent per year while annual population and employment increased at 2.9 percent and 4% respectively. This is probably due to increases in through traffic as well as increased average trip lengths. Increased trip lengths are caused by the increasing distances between trip origins and destinations due to suburbanization. We can only speculate that average trip lengths are increasing in the Livermore Valley; in urban areas around the nation, this increase has been common from the 1950s to the 1970s.

The growth expected in the Tri-Valley area represents an increase of 66 percent in households and 161 percent in employment from 1983 to 2005, which is equivalent to annual growth rates of 2.3 percent in households and 4.5 percent in employment. As could be expected, these growth rates create a large amount of vehicular traffic on area freeways and arterials over and above what now exists.

With Las Positas, households are expected to increase 3.2 percent annually, jobs 5.1 percent increase annually, and volumes on I-580 and parallel routes 5.2 percent increase annually. These findings were expected and are consistent with population, employment and traffic growth projections in other urban areas. (The Tri-Valley Transportation Study shows only a 2.9 percent annual growth in traffic, and this is probably too low. It should be noted that a gravity model was not developed for that study.)

#### 2005 Traffic Without Las Positas Development

The forecast of auto traffic volumes in 2005 on the network shown in Figure 3c without the Las Positas development is displayed in Figures 4-AM-1 and 4-PM-1 for the AM and PM peak hours respectively. The volumes displayed are two-way, peak-hour volumes operating at LOS D or better on a network of roads designed to accommodate that demand.

In order to demonstrate that the 2005 "without" network does indeed permit an LOS D operation, two tables of link analyses have been prepared which summarize capacity and volume data. Tables AM-1 and PM-1 show, for each link in the network, the ratio of volume to capacity in 2005 without the Las Positas trips, based on the characteristics of each link and on the forecasted traffic volumes. Links and nodes in Figure 3c are numbered in the way that the UTPS programs refer to them.

An important feature of these link analyses tables is the ratio of volume to capacity displayed in the seventh column. That ratio is computed by dividing the traffic volume assigned to each link by the product of the number of lanes and the per lane capacity. Note that almost every link is calculated to have a v/c ratio of 0.90 or lower, which is equivalent to LOS D. In a few cases, the v/c ratio lies between 0.90 and 0.92 because



A M1 LINK ANALYSIS 2005 TRAFFIC WITHOUT L P NET & WITHOUT L P TRPS AM  
 A NODE B LGTH MI LN CAP '83#LNS '05#LNS ASGN VOL VOL/CAP CST FAD TTL CST

A102B104	.73	1000	4	4	1308	0.33	10	0
A102B146	.16	1100	2	2	100	0.45	2	0
A104B106	1.88	1000	4	4	243	0.06	10	0
A104B144	.1	800	2	6	3238	0.67	2	127
A105B115	6.7	1100	4	4	1728	0.39	.5	0
A105B106	2	1100	4	4	1166	0.27	2	0
A105B107	1.9	1000	2	2	562	0.28	10	3130
A106B107	1.59	1000	4	4	0	0.00	10	0
A106B140	.21	800	4	4	1339	0.39	2	0
A107B139	.21	800	2	4	1263	0.39	2	266
A107B108	1.59	1000	4	4	701	0.18	10	0
A108B110	1.93	1000	4	4	1723	0.43	10	0
A108B143	1.23	800	2	2	538	0.34	2	0
A110B112	1.15	1000	4	4	2352	0.59	10	0
A110B134	.13	800	4	6	2835	0.59	2	82
A112B114	.31	1000	4	6	4453	0.74	10	511
A112B162	.94	800	2	2	741	0.46	2	0
A114B133	.7	800	4	4	0	0.00	2	0
A114B116	.26	1000	6	6	4453	0.74	10	0
A115B116	7	1750	8	8	6664	0.43	2	0
A116B118	.78	1000	4	4	417	0.10	10	0
A116B132	.75	1750	8		8500	0.61	2	0
A118B131	.83	800	2	2	26	0.02	2	0
A118B120	1.04	1100	4	4	444	0.10	2	0
A120B129	.46	800	0	2	0	0.00	10	758
A120B122	1.61	1000	4	4	444	0.11	10	0
A122B124	.63	1000	4	4	1749	0.44	10	0
A122B128	.42	800	4	4	1548	0.48	10	0
A124B126	1.15	1000	4	4	327	0.08	10	0
A125B126	4.4	1750	4	4	5412	0.77	2	0
A125B207	5.5	1000	2	2	833	0.42	10	0
A126B176	1.2	800	2	2	1430	0.89	2	0
A126B128	1.46	1750	4	4	5526	0.79	2	0
A128B129	1.56	1750	4	6	7575	0.72	2	988
A128B174	1.35	800	4	4	1012	0.32	10	0
A129B168	.65	800	0	6	3208	0.67	10	3212
A129B131	.83	1750	4	8	9446	0.67	2	1052
A130B131	.13	800	2	14	7775	0.69	10	1285
A130B166	.73	800	2	2	879	0.55	10	0
A131B132	.83	1750	4	10	14163	0.81	2	1578
A132B164	.89	1750	8		12255	0.70	2	564
A132B133	.31	1750	6	10	14545	0.83	2	393
A133B160	.6	800	4	4	2211	0.69	2	0
A133B134	1.53	1750	6	10	13718	0.78	2	1939
A134B136	1.35	800	2	6	3134	0.65	2	1711
A134B139	3.7	1750	6	8	11212	0.80	2	2344
A136B138	.73	800	2	8	4150	0.65	2	1388
A136B154	.94	800	2	4	1016	0.32	2	596
A138B143	.8	800	2	6	2403	0.50	2	1014
A139B141	.63	800	2	10	5676	0.71	2	1996
A139B140	1.3	1750	6	10	10826	0.62	2	1647
A140B144	1.77	1750	6	12	15332	0.73	2	3364
A140B142	.63	800	4	6	3583	0.75	2	399
A141B147	.63	1100	0	6	3560	0.54	2	1198
A141B143	1.1	800	2	4	1865	0.58	2	1394
A141B145	.47	800	2	8	3868	0.60	2	1191
A142B145	.83	800	4	6	3583	0.75	2	526
A142B151	2.15	800	0	0	0	0.00	2	0

**TABLE AM-1**  
**LINK ANALYSIS 2005**  
**AM PEAK TRAFFIC**

**WITHOUT LAS POSITAS NETWORK**  
**WITHOUT LAS POSITAS TRIPS**

### Column Titles

Column 1 - Link identifier:  
 Node A number  
 & Node B number

Column 2 - Length in miles

Column 3 - Lane capacity  
 (vehicles per hour  
 per lane)

Column 4 - Number of lanes,  
 1983

Column 5 - Number of lanes,  
 2005

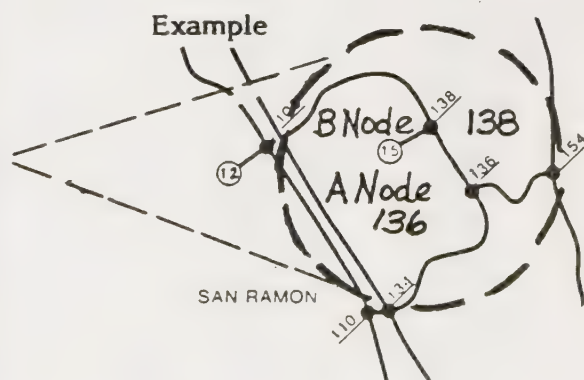
Column 6 - Assigned two-way  
 peak hour volumes

Column 7 - Volume to capacity  
 ratio

Column 8 - Cost factor\*

Column 9 - Total cost\*

\*Discussed in mitigating measures  
 section





A144B145	.73	1750	6	6	9587	0.71	2	467
A144B143	1.04	800	2	8	4314	0.67	2	1977
A146B145	1.15	1000	2	4	1856	0.41	10	1857
*A147B152	.65	1100	0	4	2237	0.51	2	852
A148B150	2.25	1000	2	2	345	0.18	10	0
A149B152	1.25	1000	0	4	2922	0.73	2	1554
A149B186	1.67	1000	0	2	396	0.20	2	1058
A150B196	4.69	1000	2	2	12	0.01	2	0
A150B151	.63	1000	2	2	352	0.16	10	0
A151B152	2.08	1000	2	2	352	0.18	10	0
A152B154	1.98	1000	2	4	1322	0.33	2	1255
A154B156	1.67	1000	2	6	2338	0.39	2	2116
A156B162	.5	800	2	4	981	0.31	2	317
A156B158	.78	800	4	6	1932	0.40	2	494
A158B297	2.05	800	0	0	0	0.00	2	ERROR
A158B160	.25	800	4	4	1450	0.45	2	0
A158B164	.31	800	4	8	3332	0.52	2	393
A164B166	.78	800	4	4	611	0.19	10	0
A164B183	.96	1750	8		13200	0.75	2	605
A165B167	.49	800	0	2	429	0.27	2	310
A165B183	.65	800	0	2	429	0.27	2	412
A165B166	.52	800	4	4	389	0.12	10	0
A165B169	.42	800	4	4	389	0.12	10	0
A166B168	.68	800	4	4	1100	0.34	10	0
A167B168	.44	800	4	4	602	0.19	10	0
A167B169	.44	800	4	4	174	0.25	10	0
*A168B170	.47	800	4	8	4549	0.71	10	1549
A169B180	.44	800	4	4	567	0.18	10	0
A170B172	1.56	800	2	2	181	0.11	10	0
A170B179	.63	800	2	6	2858	0.50	10	2876
A172B178	1.09	800	2	2	604	0.36	10	0
A172B174	.21	800	2	2	785	0.49	10	0
A174B176	.36	800	2	4	1712	0.54	10	593
A176B198	.52	800	2	6	2924	0.61	10	1713
A178B179	.68	800	2	4	1652	0.52	10	1120
A178B299	.62	800	4	4	1734	0.54	2	0
A180B182	.78	800	4	6	2927	0.61	2	494
A180B181	.65	800	4	4	1663	0.52	2	0
A180B299	.42	800	4	4	1826	0.57	2	0
A181B191	1.33	800	0	4	1256	0.39	2	1685
A182B297	.39	800	2	2	683	0.43	2	0
A182B196	1.06	1750	8		12994	0.74	2	672
A182B183	.96	1750	8		13628	0.78	2	608
A184B297	1.11	800	2	2	683	0.43	2	0
A184B186	4.17	1000	2	2	57	0.03	10	0
A186B188	2.5	1000	2	2	354	0.18	.5	0
A188B254	3.18	1000	2	2	32	0.02	.5	0
A188B190	4.54	1000	2	2	357	0.12	10	0
A190B231	.76	800	0	2	357	0.22	2	482
A190B301	.4	800	0	0	0	0.00	2	0
A190B300	.4	800	0	0	0	0.00	2	0
A191B196	.46	800	0	4	1240	0.39	2	583
A191B199	1.83	800	0	2	272	0.17	2	1159
A191B225	1.89	800	0	2	16	0.01	2	1198
A192B193	.78	800	2	2	302	0.19	2	0
A192B194	.05	800	2	2	302	0.19	2	0
A192B301	.6	800	0	0	0	0.00	2	0
A193B195	1.5	800	0	0	0	0.00	2	0
A193B301	.6	800	0	0	0	0.00	2	0
A194B196	1.79	1750	8		13431	0.77	2	1134
A194B231	.73	1750	8		13733	0.78	2	463
A194B229	1.04	800	2	2	0	0.00	2	0
A195B196	.39	800	2	2	567	0.37	2	0
A195B297	1.04	800	0	0	0	0.00	2	0

TABLE AM-1  
(CONTINUED)

A198B199	2.4	1000	2	4	1016	0.37	10	3934
A199B200	1.56	1000	2	4	1397	0.35	10	2573
A200B216	.91	800	0	4	1611	0.50	2	1150
A200B202	1.04	800	4	4	485	0.15	2	0
A200B201	.8	800	2	4	1538	0.48	2	507
A201B205	.8	800	2	2	24	0.00	2	0
A202B204	.52	800	4	4	642	0.20	2	0
A202B204	.83	800	4	4	157	0.05	10	0
A203B204	1.15	800	4	4	1618	0.51	2	0
A203B206	.01	800	2	2	1313	0.82	2	0
A204B212	.52	800	4	4	1496	0.47	10	0
A205B207	1.30	800	0	2	24	0.00	2	1159
A205B206	1.4	800	2	2	0	0.00	2	0
A206B207	2.5	1000	2	2	809	0.40	10	0
A206B210	.68	800	2	2	922	0.55	2	0
A208B210	.31	800	2	4	2088	0.55	2	196
A210B212	1.41	800	2	2	1166	0.73	10	0
A212B214	.14	800	4	4	2662	0.83	10	0
A214B234	1.11	800	4	4	730	0.20	10	0
A214B216	.36	800	4	6	3255	0.60	10	593
A214B236	.25	800	4	4	1354	0.42	10	0
A216B218	.31	800	4	4	2336	0.73	10	0
A218B232	.48	800	4	8	3432	0.54	2	608
A218B234	1.15	800	2	4	1913	0.60	2	729
A219B220	.31	800	2	4	1930	0.60	2	196
A220B222	.31	800	2	8	4460	0.70	2	589
A222B224	.63	800	2	2	130	0.08	2	0
A222B223	.13	800	2	8	4354	0.68	2	247
A223B228	.13	800	2	8	4354	0.68	2	247
A224B226	.63	800	2	2	261	0.16	2	0
A225B226	.46	800	0	2	16	0.01	2	291
A226B227	.26	800	2	4	1700	0.53	2	165
A227B229	.26	800	2	8	4044	0.63	2	494
A228B230	.63	1750	8		8620	0.62	2	0
A229B231	1.2	1750	8		12404	0.71	2	760
A229B231	.33	800	0	6	4044	0.84	2	627
A230B332	.2	800	4	8	3432	0.54	2	253
A230B233	.9	1750	8	8	6752	0.48	2	0
A230B310	.6	800	2	2	0	0.00	2	0
A232B334	.2	800	2	4	2423	0.00	2	127
A232B233	.9	1750	8	8	6752	0.48	2	0
A232B252	.99	1750	8	8	5485	0.37	2	0
A232B287	.15	800	2	0	0	0.00	2	0
A233B336	.1	800	0	0	0	0.00	2	0
A233B277	1.25	800	0	0	0	0.00	2	0
A234B334	.7	800	2	4	2423	0.76	2	444
A236B238	1.35	800	4	4	2	0.00	10	0
A236B242	2.1	1000	2	4	1352	0.34	10	3459
A238B240	1.15	800	4	4	1639	0.51	2	0
A240B240	1.25	800	4	4	0	0.00	2	0
A240B244	.99	800	2	2	1020	0.64	2	0
A240B252	2.03	1100	2	2	621	0.28	2	0
A242B244	.68	800	2	2	960	0.60	2	0
A244B246	1.3	1100	2	2	131	0.06	2	0
A246B248	1	800	2	2	3	0.00	2	0
A248B250	2.65	800	2	2	3	0.00	2	0
A250B252	1.41	1750	8	8	5129	0.37	2	0
A251B252	.01	1100	4	4	1047	0.24	2	0
A251B285	.53	800	4	4	886	0.28	2	0
A254B265	.16	800	2	2	0	0.00	.5	0
A263B265	.69	1000	0	0	0	0.00	.5	0
A283B285	.65	800	4	4	886	0.28	2	0
A332B336	.9	800	0	0	0	0.00	2	0
A334B336	.9	800	0	0	0	0.00	2	0

TABLE AM-1  
(CONTINUED)

PM1 LINK ANALYSIS 2005 TRAFFIC WITHOUT L P NET & WITHOUT L P TRPS PM  
A NODE B LGTH MI LN CAP 193#LNS 105#LNS ASGN VOL VOL/CAP CST FAC TTL CST

A102B104	.73	1000	4	4	1064	0.27	10	0
A102B146	.16	1100	2	2	217	0.10	2	0
A104B106	1.88	1000	4	4	291	0.07	10	0
A104B144	.1	800	2	6	3982	0.83	2	127
A105B115	6.7	1100	4	4	1729	0.39	.5	0
A105B106	.2	1100	4	4	1429	0.32	2	0
A105B107	1.9	1000	2	2	301	0.15	10	3130
A106B107	1.59	1000	4	4	0	0.00	10	0
A106B140	.21	800	4	4	1425	0.45	2	0
A107B139	.21	800	2	4	1521	0.40	2	266
A107B108	1.59	1000	4	4	1220	0.31	10	0
A108B110	1.93	1000	4	4	2186	0.55	10	0
A108B143	1.23	800	2	2	750	0.47	2	0
A110B112	1.15	1000	4	4	2963	0.74	10	0
A110B134	.13	800	4	6	3518	0.73	2	82
A112B114	.31	1000	4	6	5412	0.90	10	511
A112B162	.94	800	2	2	1352	0.85	2	0
A114B133	.7	800	4	4	0	0.00	2	0
A114B116	.26	1000	6	6	5412	0.90	10	0
A115B116	.7	1750	8	8	6947	0.50	2	0
A116B118	.78	1000	4	4	478	0.12	10	0
A116B132	.75	1750	8	8	9377	0.67	2	0
A118B131	.83	800	2	2	0	0.00	2	0
A118B120	1.04	1100	4	4	478	0.11	2	0
A120B129	.46	800	0	2	145	0.09	10	758
A120B122	1.61	1000	4	4	334	0.08	10	0
A122B124	.63	1000	4	4	2069	0.52	10	0
A122B128	.42	800	4	4	1735	0.54	10	0
A124B126	1.15	1000	4	4	385	0.10	10	0
A125B126	4.4	1750	4	4	5094	0.73	2	0
A125B207	5.5	1000	2	2	853	0.43	10	0
A126B176	1.2	800	2	2	1479	0.92	2	0
A126B128	1.46	1750	4	4	5363	0.77	2	0
A128B129	1.56	1750	4	6	8057	0.77	2	988
A129B174	1.35	800	4	4	1341	0.42	10	0
A129B168	.65	800	0	6	3841	0.80	10	3212
A129B131	.83	1750	4	8	10247	0.73	2	1052
*A130B131	.13	800	2	14	9244	0.83	10	1285
A130B166	.73	800	2	2	763	0.48	10	0
A131B132	.83	1750	4	10	15616	0.89	2	1578
A132B164	.89	1750	8	8	13975	0.80	2	564
A132B133	.31	1750	6	10	15895	0.91	2	393
A133B160	.6	800	4	4	2663	0.83	2	0
A133B134	1.53	1750	6	10	15217	0.87	2	1939
A134B136	1.35	800	2	6	3300	0.69	2	1711
A134B139	3.7	1750	6	8	12694	0.91	2	2344
A136B138	.73	800	2	8	5214	0.81	2	1388
A136B154	.94	800	2	4	1914	0.60	2	596
A138B143	.8	800	2	6	3527	0.73	2	1014
A139B141	.63	800	2	10	6303	0.79	2	1996
A139B140	1.3	1750	6	10	12967	0.74	2	1647
A140B144	1.77	1750	6	12	16649	0.79	2	3364
A140B142	.63	800	4	6	3374	0.70	2	399
A141B147	.63	1100	0	6	4238	0.64	2	1198
A141B143	1.1	800	2	4	2833	0.89	2	1394
A141B145	.47	800	2	8	4920	0.77	2	1191
A142B145	.83	800	4	6	3374	0.70	2	526
A142B151	2.15	800	0	0	0	0.00	2	0

TABLE PM-1  
LINK ANALYSIS 2005  
PM PEAK TRAFFIC  
WITHOUT LAS POSITAS  
WITHOUT LAS POSITAS

### Column Titles

Column 1 - Link identifier  
Node A number  
& Node B number

Column 2 - Length in miles

Column 3 - Lane capacity  
(vehicles per hour  
per lane)

Column 4 - Number of lanes  
1983

Column 5 - Number of lanes  
2005

Column 6 - Assigned two  
peak hour volume

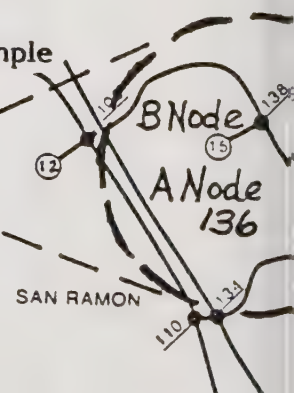
Column 7 - Volume to capacity  
ratio

Column 8 - Cost factor\*

Column 9 - Total cost\*

\*Discussed in mitigating measures  
section

Example





A144B148	.73	1750	8	8	18767	0.77	2	463
A144B148	1.04	800	2	8	5871	0.79	2	1977
A148B148	1.15	1000	2	4	3079	0.77	10	1894
A147B152	.68	1100	0	4	3178	0.72	2	862
A148B150	2.29	1000	2	2	691	0.35	10	0
A149B152	1.25	1000	0	4	3647	0.91	2	1584
A149B186	1.67	1000	0	2	623	0.31	2	1058
A150B186	4.69	1000	2	2	125	0.06	2	0
A150B151	.63	1000	2	2	566	0.28	10	0
A151B152	2.08	1000	2	2	566	0.28	10	0
A152B154	1.98	1000	2	4	2163	0.54	2	1255
A154B156	1.67	1000	2	6	4076	0.68	2	2116
A156B162	.5	800	2	4	1694	0.53	2	317
A156B158	.78	800	4	6	3158	0.66	2	494
A158B297	2.09	800	0	0	0	0.00	2	0
A158B160	.26	800	4	4	1918	0.68	2	0
A158B164	.31	800	4	8	4989	0.78	2	393
A164B166	.78	800	4	4	946	0.30	10	0
A164B183	.96	1750	8		15796	0.90	2	608
A165B167	.49	800	0	2	541	0.34	2	310
A165B183	.65	800	0	2	1121	0.70	2	412
A165B166	.52	800	4	4	569	0.18	10	0
A165B169	.42	800	4	4	957	0.30	10	0
A166B168	.68	800	4	4	1140	0.36	10	0
A167B168	.44	800	4	4	860	0.27	10	0
A167B169	.44	800	4	4	319	0.18	10	0
A168B170	.47	800	4	8	5350	0.84	10	1549
A169B180	.44	800	4	4	1276	0.40	10	0
A170B172	1.56	800	2	2	81	0.05	10	0
A170B179	.63	800	2	6	3266	0.68	10	2076
A172B178	1.09	800	2	2	604	0.38	10	0
A172B174	.21	800	2	2	784	0.49	10	0
A174B176	.36	800	2	4	2057	0.64	10	593
A176B198	.52	800	2	6	3446	0.72	10	1713
A178B179	.68	800	2	4	1986	0.62	10	1120
A178B299	.62	800	4	4	1940	0.61	2	0
A180B182	.78	800	4	6	3063	0.64	2	494
A180B181	.68	800	4	4	2284	0.71	2	0
A180B299	.42	800	4	4	2119	0.66	2	0
A181B191	1.33	800	0	4	1697	0.53	2	1685
A182B297	.39	800	2	2	1122	0.70	2	0
A182B196	1.06	1750	8		15852	0.91	2	672
A182B183	.96	1750	8		15949	0.91	2	608
A184B297	1.11	800	2	2	1122	0.70	2	0
A184B186	4.17	1000	2	2	266	0.13	10	0
A186B188	2.5	1000	2	2	484	0.24	.5	0
A188B254	3.18	1000	2	2	14	0.01	.5	0
A188B190	4.54	1000	2	2	481	0.24	10	0
A190B231	.76	800	0	2	481	0.30	2	482
A190B301	.4	800	0	0	0	0.00	2	0
A190B300	.4	800	0	0	0	0.00	2	0
A191B196	.46	800	0	4	1939	0.61	2	583
A191B199	1.83	800	0	2	920	0.58	2	1159
A191B225	1.89	800	0	2	169	0.11	2	1198
A192B193	.78	800	2	2	501	0.31	2	0
A192B194	.05	800	2	2	501	0.31	2	0
A192B301	.6	800	0	0	0	0.00	2	0
A193B195	1.5	800	0	0	0	0.00	2	0
A193B301	.6	800	0	0	0	0.00	2	0
A194B196	1.79	1750	8		15606	0.89	2	1134
A194B231	.73	1750	8		15944	0.91	2	463
A194B229	1.04	800	2	2	164	0.10	2	0
A195B196	.39	800	2	2	955	0.60	2	0
A195B297	1.04	800	0	0	0	0.00	2	0

TABLE PM-1  
(CONTINUED)

A198B199	2.4	1000	2	4	1825	0.46	10	3954
A199B200	1.56	1000	2	4	2862	0.52	10	2570
A200B226	.91	800	0	4	1518	0.47	2	1153
A200B202	1.04	800	4	4	692	0.22	2	0
A200B201	.8	800	2	4	1844	0.58	2	507
A201B205	.8	800	2	2	61	0.04	2	0
A202B204	.52	800	4	4	906	0.28	2	0
A202B224	.83	800	4	4	214	0.07	10	0
A203B204	1.15	800	4	4	1782	0.56	2	0
A203B206	.01	800	2	2	1413	0.88	2	0
A204B212	.52	800	4	4	1769	0.55	10	0
A205B207	1.83	800	0	2	61	0.04	2	1159
A205B208	1.4	800	2	2	0	0.00	2	0
A206B207	2.5	1000	2	2	792	0.40	10	0
A206B210	.68	800	2	2	1027	0.64	2	0
A206B210	.31	800	2	4	1962	0.61	2	196
A210B212	1.41	800	2	2	935	0.58	10	0
A212B214	.14	800	4	4	2704	0.95	10	0
A214B234	1.11	800	4	4	1182	0.37	10	0
A214B216	.36	800	4	6	4043	0.84	10	593
A214B236	.25	800	4	4	1867	0.58	10	0
A216B218	.31	800	4	4	2584	0.81	10	0
A218B332	.48	800	4	8	4571	0.71	2	608
A218B234	1.15	800	2	4	2407	0.75	2	729
A218B220	.31	800	2	4	1955	0.61	2	196
A220B222	.31	800	2	8	5264	0.82	2	589
A222B224	.63	800	2	2	425	0.27	2	0
A222B223	.13	800	2	8	4842	0.76	2	247
A223B228	.13	800	2	8	4842	0.76	2	247
A224B226	.83	800	2	2	636	0.40	2	0
A225B226	.46	800	0	2	169	0.11	2	291
A226B227	.26	800	2	4	2218	0.69	2	165
A227B229	.26	800	2	8	4566	0.71	2	494
A228B230	.63	1750	8		9999	0.71	2	0
A228B231	1.2	1750	8		14445	0.83	2	760
A229B231	.33	800	0	6	4402	0.92	2	627
A230B332	.2	800	4	8	4571	0.71	2	253
A230B233	.9	1750	8	8	7107	0.51	2	0
A230B310	.6	800	2	2	0	0.00	2	0
A232B334	.2	800	2	4	2922	0.91	2	127
A232B233	.9	1750	8	8	7107	0.51	2	0
A232B252	.99	1750	8	8	5187	0.37	2	0
A232B287	.15	800	2	0	0	0.00	2	0
A233B336	.1	800	0	0	0	0.00	2	0
A233B277	1.25	800	0	0	0	0.00	2	0
A234B334	.7	800	2	4	2922	0.91	2	444
A236B238	1.35	800	4	4	1	0.00	10	0
A236B242	2.1	1000	2	4	1866	0.47	10	3459
A238B240	1.15	800	4	4	704	0.22	2	0
A240B248	1.25	800	4	4	0	0.00	2	0
A240B244	.99	800	2	2	1031	0.64	2	0
A240B252	2.03	1100	2	2	541	0.25	2	0
A242B244	.68	800	2	2	997	0.62	2	0
A244B246	1.3	1100	2	2	88	0.04	2	0
A246B248	1	800	2	2	1	0.00	2	0
A246B250	2.65	800	2	2	1	0.00	2	0
A250B252	1.41	1750	8	8	4965	0.35	2	0
A251B252	.01	1100	4	4	966	0.22	2	0
A251B285	.55	800	4	4	966	0.30	2	0
A254B265	.16	800	2	2	0	0.00	.5	0
A263B265	.89	1000	0	0	0	0.00	.5	0
A283B285	.65	800	4	4	966	0.30	2	0
A332B336	.9	800	0	0	0	0.00	2	0
A334B336	.9	800	0	0	0	0.00	2	0

TABLE PM-1  
(CONTINUED)

the two extra lanes needed to improve service to LOS D were not deemed to be justified for the small improvement to be realized.

The computer tables of inputs and outputs used to make the two assignments of AM and PM peak hour travel without Las Positas to the "without" network are contained in the technical appendix. These include a listing of the network links and their characteristics, a matrix display of the AM and PM trips from each zone to each other zone, and a listing of the traffic volumes assigned to each link in the AM and PM peak hours.

The ability of the "without" network to carry 2005 peak hour travel at LOS D depends on the addition of arterial and freeway capacity to many links in the road network. In Tables AM-1 and PM-1 the columns headed " '83#LNS" notes the number of lanes on each link in 1983. The column headed " '05#LNS" notes the number of lanes needed in 2005 to carry the traffic assigned to the links. Based strictly on the number of additional lanes needed to produce a LOS D in 2005, Tables AM-1 and PM-1 show the typical costs for such work. These calculated data will be used later in this report in the section on mitigating measures.

(Note: The traffic volumes forecasted for 2005 without Las Postias that are used in the tables and figures above have been compared to the corresponding volumes developed for an earlier draft of this report. The freeway volumes are within 5 percent; the arterial volumes are generally within 30 percent. The higher the volume, the closer the two figures compare. The mitigating measures derived from each set of figures are the same.)

#### 2005 Traffic With Las Positas Development

In order to understand the traffic impacts of the Las Positas development, the AM and PM trip tables "with Las Positas" were assigned to the "without" network, so that adverse impacts could be identified. The traffic volumes so produced are displayed in Figures 4-AM-2 and 4-PM-2. Also, Tables AM-2 and PM-2 show the two-way traffic volumes assigned to each link in the "without" highway network used above, and shows the volume/capacity ratio based on the number of lanes used there. The number of links with a v/c ratio over 0.9 indicates the places where Las Positas traffic will have an impact. No cost data have been calculated for this scenario.

The "with Las Positas" network was developed from earlier assignments of Las Positas traffic. Links were added and expanded until a LOS D or better operating condition was achieved. The traffic volumes derived by assigning the "with Las Positas" trip table to the "with Las Positas" network are displayed in Figures 4-AM-3 and 4-PM-3 for the AM and PM peak hours respectively. As noted above, these volumes correspond very closely with traffic forecasts prepared for an earlier draft of this report.





MI LINK ANALYSIS 2005 TRAFFIC WITHOUT L P NET WITH L P TRPS TRPS AM  
 NODE B LGTH MI LN CAP 1983#LNS 2005#LNS ASGN VOL VOL/CAP A M PK TTL CST

102B104	.73	1000	4	4	1310	0.33	10	0
102B146	.16	1100	2	2	39	0.02	2	0
104B106	1.88	1000	4	4	137	0.03	10	0
104B144	.1	800	2	6	3394	0.71	2	127
105B115	6.7	1100	4	4	1731	0.39	.5	0
105B106	2	1100	4	4	1186	0.27	2	0
105B107	1.9	1000	2	2	545	0.27	10	3130
106B107	1.59	1000	4	4	0	0.00	10	0
106B140	.21	800	4	4	1049	0.33	2	0
107B139	.21	800	2	4	1213	0.38	2	266
107B108	1.59	1000	4	4	668	0.17	10	0
108B110	1.93	1000	4	4	1588	0.40	10	0
108B143	1.23	800	2	2	371	0.23	2	0
110B112	1.15	1000	4	4	2147	0.54	10	0
110B134	.13	800	4	6	2854	0.59	2	82
112B114	.31	1000	4	6	4405	0.73	10	511
112B162	.94	800	2	2	760	0.48	2	0
114B133	.7	800	4	4	0	0.00	2	0
114B116	.26	1000	6	6	4405	0.73	10	0
115B116	7	1750	8	8	7059	0.50	2	0
116B118	.78	1000	4	4	373	0.09	10	0
116B132	.75	1750	8		9110	0.65	2	0
118B131	.83	800	2	2	17	0.01	2	0
118B120	1.04	1100	4	4	390	0.09	2	0
120B129	.46	800	0	2	6	0.00	10	758
120B122	1.61	1000	4	4	396	0.10	10	0
122B124	.63	1000	4	4	1842	0.46	10	0
122B128	.42	800	4	4	1487	0.46	10	0
124B126	1.15	1000	4	4	405	0.10	10	0
125B126	4.4	1750	4	4	5682	0.81	2	0
125B207	5.5	1000	2	2	912	0.46	10	0
126B176	1.2	800	2	2	1187	0.74	2	0
126B128	1.46	1750	4	4	5439	0.78	2	0
128B129	1.56	1750	4	6	7803	0.74	2	988
128B174	1.35	800	4	4	1155	0.36	10	0
129B168	.65	800	0	6	3106	0.65	10	3212
129B131	.83	1750	4	8	9550	0.68	2	1052
130B131	.13	800	2	14	7598	0.68	10	1285
130B166	.73	800	2	2	810	0.51	10	0
131B132	.83	1750	4	10	14301	0.82	2	1578
132B164	.89	1750	8		14234	0.81	2	564
132B133	.31	1750	6	10	14931	0.85	2	393
133B160	.6	800	4	4	2027	0.63	2	0
133B134	1.53	1750	6	10	14122	0.81	2	1939
134B136	1.35	800	2	6	3212	0.67	2	1711
134B139	3.7	1750	6	8	11470	0.82	2	2344
136B138	.73	800	2	8	4322	0.68	2	1388
136B154	.94	800	2	4	1110	0.35	2	596
138B143	.8	800	2	6	2174	0.45	2	1014
139B141	.63	800	2	10	5403	0.68	2	1996
139B140	1.3	1750	6	10	11319	0.65	2	1647
140B144	1.77	1750	6	12	15892	0.76	2	3364
140B142	.63	800	4	6	3525	0.73	2	399
141B147	.63	1100	0	6	3320	0.50	2	1198
141B143	1.1	800	2	4	1803	0.56	2	1394
141B145	.47	800	2	8	3734	0.58	2	1191
142B145	.83	800	4	6	3525	0.73	2	526
142B151	2.15	800	0	0	0	0.00	2	0

**TABLE AM-2**  
 LINK ANALYSIS 2005  
 AM PEAK TRAFFIC  
 WITHOUT LAS POSITAS NETWORK  
 WITH LAS POSITAS TRIPS

**Column Titles**

Column 1 - Link identifier:  
 Node A number  
 & Node B number

Column 2 - Length in miles

Column 3 - Lane capacity  
 (vehicles per hour  
 per lane)

Column 4 - Number of lanes,  
 1983

Column 5 - Number of lanes,  
 2005

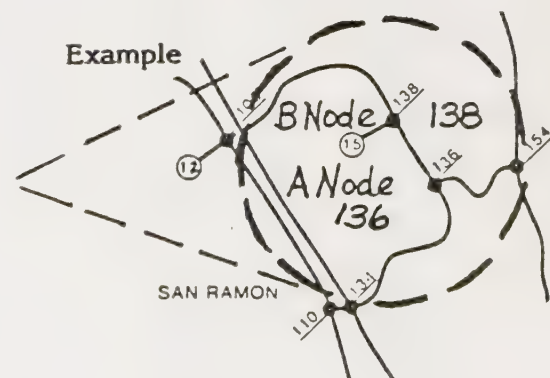
Column 6 - Assigned two-way  
 peak hour volumes

Column 7 - Volume to capacity  
 ratio

Column 8 - Cost factor\*

Column 9 - Total cost\*

\*Discussed in mitigating measures  
 section



A144B146	.73	1750	6	8	10406	0.74	2	463
A144B148	1.04	800	2	8	4330	0.68	2	1977
A146B148	1.15	1000	2	4	1606	0.40	10	1894
*A147B152	.68	1100	0	4	2196	0.50	2	862
A148B150	2.29	1000	2	2	366	0.18	10	0
A149B152	1.25	1000	0	4	2781	0.70	2	1584
A149B186	1.67	1000	0	2	537	0.25	2	1058
A150B186	4.69	1000	2	2	16	0.01	2	0
A150B151	.63	1000	2	2	349	0.17	10	0
A151B152	2.08	1000	2	2	349	0.17	10	0
A152B154	1.98	1000	2	4	1504	0.38	2	1255
A154B156	1.67	1000	2	6	2614	0.44	2	2116
A156B162	.5	800	2	4	1023	0.32	2	317
A156B158	.78	800	4	6	2066	0.43	2	494
A158B297	2.09	800	0	0	0	0.00	2	0
A158B160	.26	800	4	4	3580	1.12	2	0
A158B164	.31	800	4	8	3619	0.57	2	393
A154B166	.78	800	4	4	545	0.17	10	0
A164B183	.96	1750	8		15734	0.90	2	608
A165B167	.49	800	0	2	545	0.34	2	310
A165B183	.65	800	0	2	636	0.40	2	412
A165B166	.52	800	4	4	357	0.11	10	0
A165B169	.42	800	4	4	448	0.14	10	0
A166B168	.68	800	4	4	998	0.31	10	0
A167B168	.44	800	4	4	752	0.24	10	0
A167B169	.44	800	4	4	208	0.07	10	0
*A168B170	.47	800	4	8	4432	0.69	10	1549
A169B180	.44	800	4	4	656	0.21	10	0
A170B172	1.56	800	2	2	164	0.10	10	0
A170B179	.63	800	2	6	2691	0.56	10	2076
A172B178	1.09	800	2	2	536	0.34	10	0
A172B174	.21	800	2	2	699	0.44	10	0
A174B176	.36	800	2	4	1815	0.57	10	593
A176B198	.52	800	2	6	2869	0.60	10	1713
A178B179	.68	800	2	4	1779	0.56	10	1120
A178B299	.62	800	4	4	1797	0.56	2	0
A180B182	.78	800	4	6	2885	0.60	2	494
A180B181	.68	800	4	4	1746	0.55	2	0
A180B299	.42	800	4	4	1795	0.56	2	0
A181B191	1.33	800	0	4	1528	0.48	2	1685
A182B297	.39	800	2	2	782	0.49	2	0
A182B196	1.06	1750	8		16022	0.92	2	672
A182B183	.96	1750	8		16188	0.93	2	608
A184B297	1.11	800	2	2	782	0.49	2	0
A184B186	4.17	1000	2	2	77	0.04	10	0
A186B188	2.5	1000	2	2	448	0.22	.5	0
A188B254	3.18	1000	2	2	36	0.02	.5	0
A188B190	4.54	1000	2	2	457	0.23	10	0
A190B231	.76	800	0	2	457	0.29	2	482
A190B301	.4	800	0	0	0	0.00	2	0
A190B300	.4	800	0	0	0	0.00	2	0
A191B196	.46	800	0	4	1679	0.52	2	583
A191B199	1.83	800	0	2	523	0.33	2	1159
A191B225	1.89	800	0	2	87	0.05	2	1198
A192B193	.78	800	2	2	354	0.22	2	0
A192B194	.05	800	2	2	354	0.22	2	0
A192B301	.6	800	0	0	0	0.00	2	0
A193B195	1.5	800	0	0	0	0.00	2	0
A193B301	.6	800	0	0	0	0.00	2	0
A194B196	1.79	1750	8		16485	0.94	2	1134
A194B231	.73	1750	8		16745	0.96	2	463
A194B229	1.04	800	2	2	93	0.06	2	0
A195B196	.39	800	2	2	505	0.32	2	0
A195B297	1.04	800	0	0	0	0.00	2	0

TABLE AM-2  
(CONTINUED)



A198B199	2.4	1000	2	4	1557	0.39	10	3954
A199B200	1.56	1000	2	4	1872	0.47	10	2570
A200B226	.91	800	0	4	1615	0.50	2	1153
A200B202	1.04	800	4	4	536	0.17	2	0
A200B201	.8	800	2	4	1619	0.51	2	507
A201B205	.8	800	2	2	185	0.07	2	0
A202B204	.52	800	4	4	820	0.26	2	0
A202B224	.83	800	4	4	284	0.09	10	0
A203B204	1.15	800	4	4	1778	0.56	2	0
A203B206	.01	800	2	2	1469	0.92	2	0
A204B212	.52	800	4	4	1670	0.52	10	0
A205B207	1.83	800	0	2	49	0.03	2	1159
A205B206	1.4	800	2	2	57	0.04	2	0
A206B207	2.5	1000	2	2	863	0.43	10	0
A206B210	.68	800	2	2	1065	0.67	2	0
A208B210	.31	800	2	4	1630	0.51	2	196
A210B212	1.41	800	2	2	669	0.42	10	0
A212B214	.14	800	4	4	2307	0.72	10	0
A214B234	1.11	800	4	4	973	0.30	10	0
A214B216	.36	800	4	6	2953	0.62	10	593
A214B236	.25	800	4	4	1654	0.52	10	0
A216B218	.31	800	4	4	2595	0.81	10	0
A218B332	.48	800	4	8	4769	0.75	2	603
A218B234	1.15	800	2	4	2417	0.76	2	729
A218B220	.31	800	2	4	2263	0.71	2	196
A220B222	.31	800	2	8	4158	0.65	2	589
A222B224	.63	800	2	2	416	0.26	2	0
A222B223	.13	800	2	8	4140	0.65	2	247
A223B228	.13	800	2	8	4140	0.65	2	247
A224B226	.83	800	2	2	302	0.19	2	0
A225B226	.46	800	0	2	87	0.05	2	291
A226B227	.26	800	2	4	1892	0.59	2	165
A227B229	.26	800	2	8	4010	0.63	2	494
A228B230	.63	1750	8		13416	0.96	2	0
A228B231	1.2	1750	8		16743	0.96	2	760
A229B231	.33	800	0	6	3917	0.82	2	627
A230B332	.2	800	4	8	4769	0.75	2	253
A230B233	.9	1750	8	8	12351	0.88	2	0
A230B310	.6	800	2	2	0	0.00	2	0
A232B334	.2	800	2	4	2737	0.86	2	127
A232B233	.9	1750	8	8	12351	0.88	2	0
A232B252	.99	1750	8	8	4563	0.33	2	0
A232B287	.15	800	2	0	0	0.00	2	0
A233B336	.1	800	0	0	0	0.00	2	0
A233B277	1.25	800	0	0	0	0.00	2	0
A234B334	.7	800	2	4	2737	0.86	2	444
A236B238	1.35	800	4	4	125	0.04	10	0
A236B242	2.1	1000	2	4	1775	0.44	10	3459
A238B240	1.15	800	4	4	389	0.12	2	0
A240B248	1.25	800	4	4	77	0.02	2	0
A240B244	.99	800	2	2	1356	0.85	2	0
A240B252	2.03	1100	2	2	1304	0.59	2	0
A242B244	.68	800	2	2	1352	0.85	2	0
A244B246	1.3	1100	2	2	89	0.04	2	0
A246B248	1	800	2	2	81	0.05	2	0
A248B250	2.65	800	2	2	4	0.00	2	0
A250B252	1.41	1750	8	8	6099	0.44	2	0
A251B252	.01	1100	4	4	3500	0.80	2	0
A251B285	.55	800	4	4	3500	1.09	2	0
A254B265	.16	800	2	2	0	0.00	.5	0
A263B265	.89	1000	0	0	0	0.00	.5	0
A283B285	.65	800	4	4	3500	1.09	2	0
A332B336	.9	800	0	0	0	0.00	2	0
A334B336	.9	800	0	0	0	0.00	2	0

TABLE AM-2  
(CONTINUED)

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A NOFF B LGTH MI LN CAP '83#LN6 '85#LN6 ASGN VOL VOL/CAP F M PK TTL CST
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A102B104	.73	1000	4	4	1099	0.27	10	0
A102B146	.16	1100	2	2	276	0.13	2	0
A104B106	1.88	1000	4	4	231	0.06	10	0
A104B144	.1	800	2	6	3995	0.83	2	127
A105B115	6.7	1100	4	4	1808	0.41	.5	0
A105B106	2	1100	4	4	1495	0.34	2	0
A105B107	1.9	1000	2	2	312	0.16	10	3130
A106B107	1.59	1000	4	4	0	0.00	10	0
A106B140	.21	800	4	4	1401	0.44	2	0
A107B139	.21	800	2	4	1403	0.44	2	266
A107B108	1.59	1000	4	4	1091	0.27	10	0
A108B110	1.93	1000	4	4	2253	0.56	10	0
A108B143	1.23	800	2	2	625	0.39	2	0
A110B112	1.15	1000	4	4	2949	0.74	10	0
A110B134	.13	800	4	6	3497	0.73	2	82
A112B114	.31	1000	4	6	5763	0.96	10	511
A112B162	.94	800	2	2	1314	0.82	2	0
A114B133	.7	800	4	4	0	0.00	2	0
A114B116	.26	1000	6	6	5763	0.96	10	0
A115B116	7	1750	8	8	7506	0.54	2	0
A116B118	.78	1000	4	4	387	0.10	10	0
A116B132	.75	1750	8		10176	0.73	2	0
A118B131	.83	800	2	2	0	0.00	2	0
A118B120	1.04	1100	4	4	387	0.09	2	0
A120B129	.46	800	0	2	105	0.07	10	758
A120B122	1.61	1000	4	4	282	0.07	10	0
A122B124	.63	1000	4	4	2055	0.51	10	0
A122B128	.42	800	4	4	1713	0.54	10	0
A124B126	1.15	1000	4	4	379	0.09	10	0
A125B126	4.4	1750	4	4	5296	0.76	2	0
A125B207	5.5	1000	2	2	1170	0.59	10	0
A126B176	1.2	800	2	2	1452	0.91	2	0
A126B128	1.46	1750	4	4	5661	0.81	2	0
A128B129	1.56	1750	4	6	8227	0.78	2	988
A128B174	1.35	800	4	4	1349	0.42	10	0
A129B168	.65	800	0	6	3664	0.76	10	3212
A129B131	.83	1750	4	8	10277	0.73	2	1052
*A130B131	.13	800	2	14	9151	0.82	10	1285
A130B166	.73	800	2	2	810	0.51	10	0
A131B132	.83	1750	4	10	15394	0.88	2	1578
A132B164	.89	1750	8		16678	0.95	2	564
A132B133	.31	1750	6	10	16842	0.96	2	393
A133B160	.6	800	4	4	2523	0.79	2	0
A133B134	1.53	1750	6	10	16073	0.92	2	1939
A134B136	1.35	800	2	6	3292	0.69	2	1711
A134B139	3.7	1750	6	8	13477	0.96	2	2344
A136B138	.73	800	2	8	5347	0.84	2	1388
A136B154	.94	800	2	4	2055	0.64	2	596
A138B143	.8	800	2	6	3396	0.71	2	1014
A139B141	.63	800	2	10	6650	0.83	2	1996
A139B140	1.3	1750	6	10	13522	0.77	2	1647
A140B144	1.77	1750	6	12	17391	0.93	2	3364
A140B142	.63	800	4	6	3233	0.67	2	399
A141B147	.63	1100	0	6	4072	0.62	2	1198
A141B143	1.1	800	2	4	2823	0.88	2	1394
A141B145	.47	800	2	8	5032	0.79	2	1191
A142B145	.83	800	4	6	3253	0.68	2	526
A142B151	2.15	800	0	0	0	0.00	2	

TABLE PM-2  
LINK ANALYSIS  
PM PEAK TRAF  
WITHOUT LAS POSITAS  
WITH LAS POSITAS

### Column Titles

Column 1 - Link identifier  
Node A number  
& Node B number

Column 2 - Length in m

Column 3 - Lane capacity  
(vehicles per  
per lane)

Column 4 - Number of  
1983

Column 5 - Number of  
2005

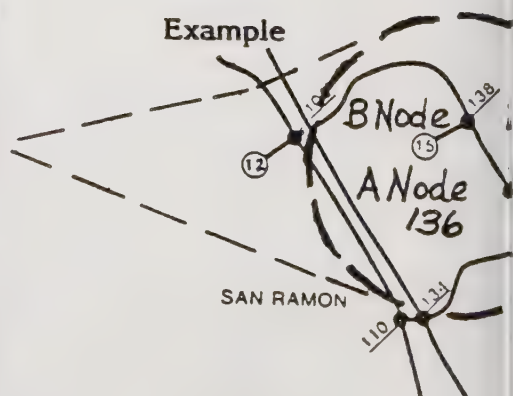
Column 6 - Assigned two  
peak hour v

Column 7 - Volume to c  
ratio

Column 8 - Cost factor

Column 9 - Total cost\*

\*Discussed in mitigating section



A144B146	.77	1750	6	6	12802	0.91	2	463
A144B148	1.04	800	2	8	3721	0.58	2	1977
A146B148	1.15	1000	2	4	4500	1.13	10	1894
A147B152	.68	1100	5	4	3148	0.72	2	862
A148B150	2.29	1000	2	2	661	0.33	10	0
A149B152	1.25	1000	0	4	3571	0.89	2	1584
A149B186	1.67	1000	0	2	743	0.37	2	1058
A150B186	4.69	1000	2	2	128	0.06	2	0
A150B151	.63	1000	2	2	534	0.27	10	0
A151B152	2.08	1000	2	2	534	0.27	10	0
A152B154	1.98	1000	2	4	2118	0.53	2	1255
A154B156	1.67	1000	2	6	4173	0.70	2	2116
A156B162	.5	800	2	4	1639	0.51	2	317
A156B158	.78	800	4	6	3203	0.67	2	494
A158B297	2.09	800	0	0	6	0.00	2	0
A158B160	.26	800	4	4	2049	0.64	2	0
A158B164	.31	800	4	8	5246	0.82	2	393
A164B166	.78	800	4	4	841	0.26	10	0
A164B183	.96	1750	8		18791	1.07	2	608
A165B167	.49	800	0	2	628	0.39	2	310
A165B183	.65	800	0	2	1629	1.02	2	412
A165B166	.52	800	4	4	548	0.17	10	0
A165B169	.42	800	4	4	1316	0.41	10	0
A166B168	.68	800	4	4	1102	0.34	10	0
A167B168	.44	800	4	4	910	0.28	10	0
A167B169	.44	800	4	4	282	0.09	10	0
A168B170	.47	800	4	8	5168	0.81	10	1549
A169B180	.44	800	4	4	1598	0.50	10	0
A170B172	1.56	800	2	2	219	0.14	10	0
A170B179	.63	800	2	6	3123	0.65	10	2076
A172B178	1.09	800	2	2	622	0.39	10	0
A172B174	.21	800	2	2	840	0.53	10	0
A174B176	.36	800	2	4	2157	0.67	10	593
A176B198	.52	800	2	6	3511	0.73	10	1713
A178B179	.68	800	2	4	2170	0.68	10	1120
A178B299	.62	800	4	4	2100	0.66	2	0
A180B182	.78	800	4	6	2694	0.56	2	494
A180B181	.68	800	4	4	2493	0.78	2	0
A180B299	.42	800	4	4	1889	0.59	2	0
A181B191	1.33	800	0	4	1981	0.62	2	1685
A182B297	.39	800	2	2	1408	0.88	2	0
A182B196	1.06	1750	8		19240	1.10	2	672
A182B183	.96	1750	8		18650	1.07	2	608
A184B297	1.11	800	2	2	1413	0.88	2	0
A184B186	4.17	1000	2	2	231	0.12	10	0
A186B188	2.5	1000	2	2	641	0.32	.5	0
A188B254	3.19	1000	2	2	20	0.01	.5	0
A188B190	4.54	1000	2	2	638	0.32	10	0
A190B231	.76	800	0	2	635	0.40	2	482
A190B301	.4	800	0	0	0	0.00	2	0
A190B300	.4	800	0	0	0	0.00	2	0
A191B196	.46	800	0	4	2752	0.86	2	583
A191B199	1.83	800	0	2	1456	0.91	2	1159
A191B225	1.89	800	0	2	287	0.18	2	1198
A192B193	.78	800	2	2	647	0.40	2	0
A192B194	.05	800	2	2	650	0.41	2	0
A192B301	.6	800	0	0	0	0.00	2	0
A193B195	1.5	800	0	0	0	0.00	2	0
A193B301	.6	800	0	0	0	0.00	2	0
A194B196	1.79	1750	8		18865	1.08	2	1134
A194B231	.73	1750	8		19300	1.10	2	463
A194B229	1.04	800	2	2	215	0.13	2	0
A195B196	.39	800	2	2	696	0.44	2	0
A195B297	1.04	800	0	0	0	0.00	2	0

TABLE PM-2  
(CONTINUED)



A1985199	2.4	1800	2	4	2815	0.53	10	3954
A1998200	1.56	1800	2	4	3108	0.78	10	2570
A2008201	.91	800	0	4	1501	0.47	2	1153
A2008202	1.04	800	4	4	1172	0.37	2	0
A2008201	.8	800	2	4	1842	0.58	2	507
A2018205	.8	800	2	2	225	0.14	2	0
A2028204	.52	800	4	4	1298	0.43	2	0
A2028224	.83	800	4	4	118	0.04	10	0
A2038204	1.15	800	4	4	2501	0.78	2	0
A2038206	.01	800	2	2	1872	1.17	2	0
A2048212	.52	800	4	4	2310	0.72	10	0
A2058207	1.83	800	0	2	139	0.09	2	1159
A2058206	1.4	800	2	2	86	0.05	2	0
A2068207	2.5	1000	2	2	1031	0.52	10	0
A2068210	.68	800	2	2	1373	0.86	2	0
A2088210	.31	800	2	4	2167	0.55	2	196
A2108212	1.41	800	2	2	793	0.50	10	0
A2128214	.14	800	4	4	3013	0.94	10	0
A2148234	1.11	800	4	4	1684	0.53	10	0
A2148216	.36	800	4	6	3433	0.72	10	593
A2148236	.25	800	4	4	1526	0.48	10	0
A2168218	.31	800	4	4	3593	1.12	10	0
A2188332	.48	800	4	8	5452	0.85	2	608
A2188234	1.15	800	2	4	2941	0.92	2	729
A2188220	.31	800	2	4	3076	0.96	2	196
A2208222	.31	800	2	8	5840	0.91	2	589
A2228224	.63	800	2	2	659	0.41	2	0
A2228223	.13	800	2	8	5392	0.84	2	247
A2238228	.13	800	2	8	5392	0.84	2	247
A2248226	.83	800	2	2	776	0.49	2	0
A2258226	.46	800	0	2	287	0.18	2	291
A2268227	.26	800	2	4	2150	0.67	2	165
A2278229	.26	800	2	8	4353	0.68	2	494
A2288230	.63	1750	8		15634	1.12	2	0
A2288231	1.2	1750	8		19642	1.12	2	760
A2298231	.33	800	0	6	4139	0.86	2	627
A2308332	.2	800	4	8	5452	0.85	2	253
A2308233	.9	1750	8	8	14679	1.05	2	0
A2308310	.6	800	2	2	378	0.24	2	0
A2328334	.2	800	2	4	3263	1.02	2	127
A2328233	.9	1750	8	8	14679	1.05	2	0
A2328252	.99	1750	8	8	4424	0.32	2	0
A2328287	.15	800	2	0	0	0.00	2	0
A2338336	.1	800	0	0	0	0.00	2	0
A2338277	1.25	800	0	0	0	0.00	2	0
A2348334	.7	800	2	4	3263	1.02	2	444
A2368238	1.35	800	4	4	155	0.05	10	0
A2368242	2.1	1000	2	4	1617	0.40	10	3459
A2388240	1.15	800	4	4	991	0.31	2	0
A2408248	1.25	800	4	4	48	0.02	2	0
A2408244	.99	800	2	2	1434	0.90	2	0
A2408252	2.03	1100	2	2	2026	0.92	2	0
A2428244	.68	800	2	2	1439	0.90	2	0
A2448246	1.3	1100	2	2	63	0.03	2	0
A2468248	1	800	2	2	52	0.03	2	0
A2488250	2.65	800	2	2	4	0.00	2	0
A2508252	1.41	1750	8	8	6192	0.44	2	0
A2518252	.01	1100	4	4	3592	0.82	2	0
A2518285	.55	800	4	4	3592	1.12	2	0
A2548265	.16	800	2	2	0	0.00	.5	0
A2638265	.89	1000	0	0	0	0.00	.5	0
A2838285	.65	800	4	4	3592	1.12	2	0
A3328336	.9	800	0	0	0	0.00	2	0
A3348336	.9	800	0	0	0	0.00	2	0

TABLE PM-2  
(CONTINUED)

For each link in the "with Las Positas" network, Tables AM-3 and PM-3 list the number of lanes needed in 2005, the volume assigned to it, and its volume/capacity ratio. As in the scenario without Las Positas the v/c ratio may be as high as 0.92 for a few links; however, most links are at 0.90 or less, indicating a LOS D or better operation. The cost calculations shown in these tables will be used in the next section of this report dealing with mitigating measures.

The tables of input and output data for the "with Las Positas" scenario used by the UTPS computer program are included in the Technical Appendix. These tables include the listing of the network links, the AM and PM trip tables in matrix form, and the assignments of the two trip tables to the "without" and the "with" networks.

### **Other Transportation Impacts - Airport Services**

The Las Positas project would generate demand for approximately 175 general aviation aircraft spaces at the Livermore Municipal Airport; this would be in addition to the expansion currently planned. The project would also accelerate the need for other airport improvements, such as the proposed second parallel runway.

### **MITIGATING MEASURES**

The purpose of an environmental impact review is, among other things, to measure the impacts of a proposed project on a known base condition and then to propose measures which will alleviate the adverse impacts. Because of the size and timing of the Las Positas project, the project impacts must be estimated against a future condition, which is neither known nor planned at this time. Traffic conditions in 2005 have been estimated through the modeling work described previously, but the conditions can only be estimated generally because of a myriad of details concerning future developments (size, density, location, access, etc.) that depend on future designs.

The magnitude of Las Positas traffic can be estimated with confidence since many project details are known. However, because the project traffic must be added to a much more generalized estimate of 2005 base conditions, the overall effect is to generalize the estimate of project impacts on the future "base" conditions. This discussion deals with the kinds of actions that will be needed to accommodate the impacts of future growth and also the project impacts. In many cases where forecast travel demand requires additional capacity, the three alternatives are to accomplish a major widening at the cost of residential and business relocations, to develop the needed capacity on parallel streets, or to put up with worsened traffic conditions. There are risks to each possibility, and the fact that this report may, in some cases, propose major widening projects does not mean that such projects are the best alternative.

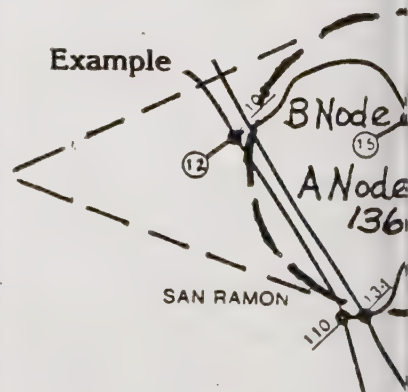
A M3 LINK ANALYSIS 2005 TRAFFIC WITH L P NET & WITH L P TRPS A M PK HR  
 4 NODE B LGTH MI LN CAP '83#LNS '05#LNS ASGN VOL VOL/CAF CST FAC1 TTLCST\*

A102B104	.73	1000	4	4	559	0.14	10	0
A102B146	.16	1100	2	2	30	0.01	2	0
A104B106	1.88	1000	4	4	0	0.00	10	0
A104B144	.1	800	2	6	3364	0.70	2	127
A105B115	6.7	1100	4	4	1777	0.40	.5	0
A105B106	2	1100	4	4	1519	0.35	2	0
A105B107	1.9	1000	2	2	258	0.13	10	3130
A106B107	1.59	1000	4	4	0	0.00	10	0
A106B140	.21	800	4	4	1519	0.47	2	0
A107B139	.21	800	2	2	1082	0.68	2	133
A107B108	1.59	1000	4	4	824	0.21	10	0
A109B110	1.93	1000	4	4	1594	0.40	10	0
A106B143	1.23	800	2	2	349	0.22	2	0
A110B112	1.15	1000	4	4	2090	0.52	10	0
A110B134	.13	800	4	6	2866	0.60	2	82
A112B114	.31	1000	4	8	4470	0.56	10	1021
A112B162	.94	800	2	2	722	0.45	2	0
A114B133	.7	800	4	4	0	0.00	2	0
A114B116	.26	1000	6	8	4470	0.56	10	428
A115B116	7	1750	8	8	7159	0.51	2	0
A116B118	.78	1000	4	4	179	0.04	10	0
A116B132	.75	1750	8		9611	0.69	2	0
A118B131	.83	800	2	2	0	0.00	2	0
A118B120	1.04	1100	4	4	179	0.04	2	0
A120B129	.46	800	0	2	25	0.00	10	758
A120B122	1.61	1000	4	4	204	0.05	10	0
A122B124	.63	1000	4	4	1717	0.43	10	0
A122B128	.42	800	4	4	1513	0.47	10	0
A124B126	1.15	1000	4	4	338	0.08	10	0
A125B126	4.4	1750	4	4	5837	0.83	2	0
A125B207	5.5	1000	2	2	831	0.42	10	0
A126B176	1.2	800	2	2	1126	0.70	2	0
A126B128	1.46	1750	4	4	5357	0.77	2	0
A128B129	1.56	1750	4	6	7971	0.76	2	988
A128B174	1.35	800	4	4	1339	0.42	10	0
A129B168	.65	800	0	6	3163	0.66	10	3212
A129B131	.83	1750	4	8	10083	0.72	2	1052
*A130B131	.13	800	2	14	7792	0.70	10	1285
A130B166	.73	800	2	2	512	0.32	10	0
A131B132	.83	1750	4	12	14371	0.68	2	2104
A132B164	.89	1750	8		14942	0.71	2	1128
A132B133	.31	1750	6	12	15024	0.72	2	589
A133B160	.6	800	4	4	2433	0.76	2	0
A133B134	1.53	1750	6	10	14574	0.83	2	1939
A134B136	1.35	800	2	6	3474	0.72	2	1711
A134B139	3.7	1750	6	10	11596	0.66	2	4689
A136B138	.73	800	2	8	4452	0.70	2	1388
A136B154	.94	800	2	4	978	0.31	2	596
A138B143	.8	800	2	6	2756	0.57	2	1014
A139B141	.63	800	2	10	5960	0.75	2	1996
A139B140	1.3	1750	6	10	11526	0.66	2	1647
A140B144	1.77	1750	6	12	14202	0.68	2	3364
A140B142	.63	800	4	4	1723	0.54	2	0
A141B147	.63	1100	0	6	3758	0.57	2	1198
A141B143	1.1	800	2	6	2407	0.50	2	2091
A141B145	.47	800	2	8	3595	0.56	2	1191
A142B145	.83	800	4	4	1723	0.54	2	0
A142B151	2.15	800	0	0	0	0.00	2	0

TABLE AM-3  
 LINK ANALYSIS 2  
 AM PEAK TRAF  
 WITH LAS POSITAS NE  
 WITH LAS POSITAS

- Column Titles
- Column 1 - Link identifier  
Node A number  
& Node B number
  - Column 2 - Length in miles
  - Column 3 - Lane capacity  
(vehicles per hour  
per lane)
  - Column 4 - Number of lanes  
1983
  - Column 5 - Number of lanes  
2005
  - Column 6 - Assigned two  
peak hour volume
  - Column 7 - Volume to capacity  
ratio
  - Column 8 - Cost factor\*
  - Column 9 - Total cost\*

\*Discussed in mitigating measures  
 section





A144B146	.73	1750	6	8	9750	0.70	2	467
A144B148	1.04	800	2	6	3532	0.74	2	1318
A146B146	1.15	1000	2	6	3925	0.65	10	3789
*A147B152	.58	1100	0	4	2740	0.62	2	862
A148B150	2.29	1000	2	2	508	0.27	10	0
A149B152	1.25	1000	0	6	3405	0.57	2	2376
A149B186	1.67	1000	0	2	1154	0.58	2	1858
A150B186	4.69	1000	2	2	236	0.12	2	0
A150B151	.63	1000	2	2	302	0.15	10	0
A151B152	2.08	1000	2	2	302	0.15	10	0
A152B154	1.98	1000	2	2	870	0.44	2	0
A154B156	1.67	1000	2	4	1848	0.46	2	1858
A156B162	.5	800	2	4	870	0.27	2	317
A156B158	.78	800	4	4	1669	0.52	2	0
A158B297	2.09	800	0	2	0	0.00	2	1324
A158B160	.26	800	4	4	1751	0.55	2	0
A158B164	.31	800	4	8	3243	0.51	2	393
A164B166	.78	800	4	4	531	0.17	10	0
A164B183	.96	1750	8		16283	0.78	2	1217
A165B167	.49	800	0	2	560	0.35	2	310
A165B183	.65	800	0	4	660	0.21	2	824
A165B166	.52	800	4	4	360	0.11	10	0
A165B169	.42	800	4	4	461	0.14	10	0
A166B168	.68	800	4	4	682	0.21	10	0
A167B168	.44	800	4	4	637	0.20	10	0
A167B169	0	800	4	4	77	0.02	10	0
*A168B170	.47	800	4	8	4357	0.68	10	1549
A169B180	.44	800	4	4	538	0.17	10	0
A170B172	1.56	800	2	2	145	0.09	10	0
A170B179	.63	800	2	6	2660	0.55	10	2076
A172B178	1.09	800	2	2	665	0.42	10	0
A172B174	.21	800	2	2	809	0.51	10	0
A174B176	.36	800	2	4	2028	0.63	10	593
A176B198	.52	800	2	6	2827	0.59	10	1713
A178B179	.68	800	2	4	1846	0.58	10	1120
A178B299	.62	800	4	4	2013	0.63	2	0
A180B182	.78	800	4	4	2881	0.90	2	0
A180B181	.68	800	4	4	1829	0.57	2	0
A180B299	.42	800	4	6	1591	0.33	2	266
A181B191	1.33	800	0	4	1606	0.50	2	1685
A182B297	.39	800	2	4	808	0.25	2	247
A182B196	1.06	1750	8		16775	0.68	2	2015
A182B183	.96	1750	8		16743	0.68	2	1825
A184B297	1.11	800	2	4	808	0.25	2	703
A184B186	4.17	1000	2	2	39	0.02	10	0
A186B188	2.5	1000	2	4	1350	0.34	.5	1109
A188B254	3.18	1000	2	2	1047	0.52	.5	0
A188B190	4.54	1000	2	2	303	0.15	10	0
A190B231	.76	800	0	2	520	0.33	2	482
A190B301	.4	800	0	4	1235	0.39	2	507
A190B300	.4	800	0	4	1460	0.46	2	507
A191B196	.46	800	0	4	1820	0.57	2	583
A191B199	1.83	800	0	2	457	0.29	2	1159
A191B225	1.89	800	0	2	11	0.01	2	1198
A192B193	.78	800	2	2	279	0.17	2	0
A192B194	.05	800	2	4	1413	0.44	2	32
A192B301	.6	800	0	4	1133	0.35	2	760
A193B195	1.5	800	0	2	0	0.00	2	950
A193B301	.6	800	0	2	101	0.06	2	380
A194B196	1.79	1750	8		17393	0.71	2	3402
A194B231	.73	1750	8		16538	0.79	2	925
A194B229	1.04	800	2	2	0	0.00	2	0
A195B196	.39	800	2	2	570	0.36	2	0
A195B297	1.04	800	0	2	0	0.00	2	659

TABLE AM-3  
(CONTINUED)

A1985199	2.4	1000	2	4	1602	0.40	10	3954
A1995200	1.56	1000	2	4	1908	0.48	10	2576
A2000202	.91	800	0	4	1761	0.55	2	1153
A2000202	1.04	800	4	4	486	0.15	2	0
A2000201	.8	800	2	4	1560	0.49	2	507
A2010205	.8	800	2	2	17	0.01	2	0
A2020204	.52	800	4	4	619	0.19	2	0
A2020224	.83	800	4	4	133	0.04	10	0
A2030204	1.15	800	4	4	1632	0.51	2	0
A2030206	.01	800	2	2	1248	0.78	2	0
A2040212	.52	800	4	4	1560	0.49	10	0
A2050207	1.83	800	0	2	17	0.01	2	1159
A2050206	1.4	800	2	2	0	0.00	2	0
A2060207	2.5	1000	2	2	813	0.41	10	0
A2060210	.68	800	2	2	838	0.52	2	0
A2080210	.31	800	2	4	1388	0.43	2	196
A2100212	1.41	800	2	2	549	0.34	10	0
A2120214	.14	800	4	4	2109	0.66	10	0
A2140234	1.11	800	4	4	757	0.24	10	0
A2140216	.36	800	4	6	3644	0.76	10	593
A2140236	.25	800	4	4	2229	0.70	10	0
A2160218	.31	800	4	6	2768	0.58	10	511
A2180332	.48	800	4	8	3566	0.56	2	608
A2180234	1.15	800	2	4	858	0.27	2	729
A2180220	.31	800	2	6	2892	0.60	2	393
A2200222	.31	800	2	10	4769	0.60	2	786
A2220224	.63	800	2	2	96	0.06	2	0
A2220223	.13	800	2	8	4672	0.73	2	247
A2230228	.13	800	2	8	4672	0.73	2	247
A2240226	.83	800	2	2	229	0.14	2	0
A2250226	.46	800	0	2	11	0.01	2	291
A2260227	.26	800	2	4	1890	0.59	2	165
A2270229	.26	800	2	8	4327	0.68	2	494
A2280230	.63	1750	8	10	13889	0.79	2	399
A2280231	1.2	1750	8	12	16464	0.78	2	1521
A2290231	.33	800	0	8	4327	0.68	2	836
A2300332	.2	800	4	8	3566	0.56	2	253
A2300233	.9	1750	8		10096	0.72	2	0
A2300310	.6	800	2		5649	0.71	2	1521
A2320334	.2	800	2	8	4244	0.66	2	300
A2320233	.9	1750	8	8	8127	0.58	2	0
A2320252	.99	1750	8	8	6473	0.46	2	0
A2320287	.15	800	2	4	1887	0.59	2	190
A2330336	.1	800	0	0	0	0.00	2	0
A2330277	1.25	800	0	6	2512	0.52	2	2376
A2340334	.7	800	2	8	4244	0.66	2	1331
A2360238	1.35	800	4	4	0	0.00	10	0
A2360242	2.1	1000	2	4	2229	0.56	10	3459
A2380240	1.15	800	4	4	476	0.15	2	0
A2400248	1.25	800	4	4	0	0.00	2	0
A2400244	.99	800	2	2	1210	0.76	2	0
A2400252	2.03	1100	2	2	734	0.33	2	0
A2420244	.68	800	2	2	1140	0.71	2	0
A2440246	1.3	1100	2	2	146	0.07	2	0
A2460248	1	800	2	2	0	0.00	2	0
A2460250	2.65	800	2	2	0	0.00	2	0
A2500252	1.41	1750	8	8	5868	0.42	2	0
A2510252	.01	1100	4	4	740	0.17	2	0
A2510285	.55	800	4	4	740	0.23	2	0
A2540265	.16	800	2	4	1066	0.33	.5	71
A2630265	.89	1000	0	2	1066	0.53	.5	395
A2630285	.65	800	4	4	658	0.21	2	0
A3320336	.9	800	0	0	0	0.00	2	0
A3340336	.9	800	0	0	0	0.00	2	0

TABLE AM-3  
(CONTINUED)

PM3 LINK ANALYSIS 2005 TRAFFIC WITH LAS POSITAS TRIPS P M PEAK HOUR  
 A NODE B LGTH MI LN CAP 1983#LNS 2005#LNS ASGN VOL VOL/CAP CST FAC TTL CST

102B104	.73	1000	4	4	877	0.22	10	0
102B146	.15	1100	2	2	267	0.12	2	0
104B106	1.89	1000	4	4	287	0.07	10	0
104B144	.1	800	2	6	3887	0.81	2	127
105B115	6.7	1100	4	4	1834	0.42	.5	0
105B106	2	1100	4	4	1469	0.33	2	0
105B107	1.9	1000	2	2	366	0.18	10	3130
106B107	1.59	1000	4	4	20	0.01	10	0
106B140	.21	800	4	4	1424	0.45	2	0
107B139	.21	800	2	2	1396	0.87	2	133
107B108	1.59	1000	4	4	1050	0.26	10	0
108B110	1.93	1000	4	4	2233	0.56	10	0
108B143	1.23	800	2	2	715	0.45	2	0
110B112	1.15	1000	4	4	2935	0.73	10	0
110B134	.13	800	4	6	3690	0.77	2	82
112B114	.31	1000	4	8	5754	0.72	10	1021
112B162	.94	800	2	2	1398	0.87	2	0
114B133	.7	800	4	4	0	0.00	2	0
114B116	.26	1000	6	8	5754	0.72	10	428
115B116	7	1750	8	8	7929	0.57	2	0
116B118	.78	1000	4	4	249	0.06	10	0
116B132	.75	1750	8		10749	0.77	2	0
118B131	.83	800	2	2	0	0.00	2	0
118B120	1.04	1100	4	4	249	0.06	2	0
120B129	.46	800	0	0	0	0.00	10	0
120B122	1.61	1000	4	4	249	0.06	10	0
122B124	.63	1000	4	4	2098	0.52	10	0
122B128	.42	800	4	4	1849	0.58	10	0
124B126	1.15	1000	4	4	375	0.09	10	0
125B126	4.4	1750	4	4	5761	0.82	2	0
125B207	5.5	1000	2	2	910	0.46	10	0
126B176	1.2	800	2	2	1455	0.91	2	0
126B128	1.46	1750	4	4	5803	0.83	2	0
128B129	1.56	1750	4	6	8724	0.83	2	988
128B174	1.35	800	4	4	1420	0.44	10	0
129B168	.65	800	0	6	3824	0.80	10	3212
129B131	.83	1750	4	8	11175	0.80	2	1052
130B131	.13	800	2	14	9366	0.84	10	1285
130B166	.73	800	2	2	651	0.41	10	0
131B132	.83	1750	4	12	16647	0.79	2	2104
132B164	.89	1750	8		17248	0.82	2	1128
132B133	.31	1750	6	12	16677	0.79	2	589
133B160	.6	800	4	4	2792	0.87	2	0
133B134	1.53	1750	6	10	16124	0.92	2	1939
134B136	1.35	800	2	6	3405	0.71	2	1711
134B139	3.7	1750	6	10	13421	0.77	2	4689
136B138	.73	800	2	8	5407	0.84	2	1388
136B154	.94	800	2	4	2002	0.63	2	596
138B143	.8	800	2	6	3815	0.79	2	1014
139B141	.63	800	2	10	6848	0.86	2	1996
139B140	1.3	1750	6	10	13532	0.77	2	1647
140B144	1.77	1750	6	12	16522	0.79	2	3364
140B142	.63	800	4	4	2497	0.78	2	0
141B147	.63	1100	0	6	4602	0.70	2	1198
141B143	1.1	800	2	6	3160	0.66	2	2091
141B145	.47	800	2	8	5043	0.79	2	1191
142B145	.83	800	4	4	2497	0.78	2	0
142B151	2.15	800	0	0	0	0.00	2	0

**TABLE PM-3**  
 LINK ANALYSIS 2005  
 PM PEAK TRAFFIC  
 WITH LAS POSITAS NETWORK  
 WITH LAS POSITAS TRIPS

**Column Titles**

Column 1 - Link identifier:  
 Node A number  
 & Node B number

Column 2 - Length in miles

Column 3 - Lane capacity  
 (vehicles per hour  
 per lane)

Column 4 - Number of lanes,  
 1983

Column 5 - Number of lanes,  
 2005

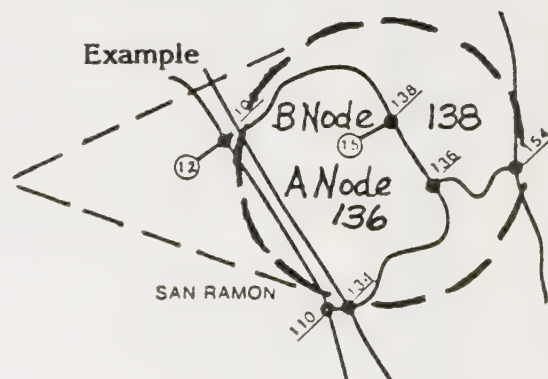
Column 6 - Assigned two-way  
 peak hour volumes

Column 7 - Volume to capacity  
 ratio

Column 8 - Cost factor\*

Column 9 - Total cost\*

\*Discussed in mitigating measures  
 section





A144B146	.73	1750	6	8	10899	0.78	2	463
A144B148	1.04	800	2	6	3906	0.81	2	1318
A146B148	1.15	1000	2	6	5059	0.84	10	3789
*A147B152	.68	1100	8	4	3739	0.85	2	862
A148B150	2.29	1000	2	2	1161	0.55	10	0
A149B152	1.25	1000	0	6	4322	0.72	2	2376
A149B186	1.67	1000	0	2	1678	0.84	2	1058
A150B186	4.69	1000	2	2	592	0.30	2	0
A150B151	.63	1000	2	2	569	0.28	10	0
A151B152	2.08	1000	2	2	569	0.28	10	0
A152B154	1.98	1000	2	2	1646	0.82	2	0
A154B156	1.67	1000	2	4	3556	0.89	2	1058
A156B162	.5	800	2	4	1576	0.49	2	317
A156B158	.78	800	4	4	2912	0.91	2	0
A158B297	2.09	800	0	2	12	0.01	2	1324
A158B160	.26	800	4	4	2185	0.68	2	0
A158B164	.31	800	4	8	4978	0.78	2	393
A164B166	.78	800	4	4	741	0.23	10	0
A164B183	.96	1750	8		19418	0.92	2	1217
A165B167	.49	800	0	2	690	0.43	2	310
A165B183	.65	800	0	4	1567	0.49	2	824
A165B166	.52	800	4	4	563	0.18	10	0
A165B169	.42	800	4	4	1194	0.37	10	0
A166B168	.68	800	4	4	828	0.26	10	0
A167B168	.44	800	4	4	908	0.28	10	0
A167B169	.44	800	4	4	218	0.07	10	0
*A168B170	.47	800	4	8	5207	0.81	10	1549
A169B180	.44	800	4	4	1412	0.44	10	0
A170B172	1.56	800	2	2	179	0.11	10	0
A170B179	.63	800	2	6	3130	0.65	10	2076
A172B178	1.09	800	2	2	731	0.46	10	0
A172B174	.21	800	2	2	910	0.57	10	0
A174B176	.36	800	2	4	2263	0.71	10	593
A176B198	.52	800	2	6	3510	0.73	10	1713
A178B179	.68	800	2	4	2287	0.71	10	1120
A178B299	.62	800	4	4	2341	0.73	2	0
A180B182	.78	800	4	4	2898	0.91	2	0
A180B181	.68	800	4	4	1585	0.50	2	0
A180B299	.42	800	4	6	2852	0.59	2	266
A181B191	1.33	800	0	4	2107	0.66	2	1685
A182B297	.39	800	2	4	1545	0.48	2	247
A182B196	1.06	1750	8		19965	0.81	2	2015
A182B183	.96	1750	8		19478	0.80	2	1825
A184B297	1.11	800	2	4	1567	0.49	2	703
A184B186	4.17	1000	2	2	235	0.12	10	0
A186B188	2.5	1000	2	4	2036	0.51	.5	1109
A188B254	3.18	1000	2	2	1501	0.75	.5	0
A188B190	4.54	1000	2	2	534	0.27	10	0
A190B231	.76	800	0	2	881	0.55	2	482
A190B301	.4	800	0	4	1939	0.61	2	507
A190B300	.4	800	0	4	2335	0.73	2	507
A191B196	.46	800	0	4	2682	0.84	2	583
A191B199	1.83	800	0	2	1036	0.65	2	1159
A191B225	1.89	800	0	2	291	0.18	2	1198
A192B193	.78	800	2	2	458	0.29	2	0
A192B194	.05	800	2	4	2210	0.69	2	32
A192B301	.6	800	0	4	1754	0.55	2	760
A193B195	1.5	800	0	2	10	0.01	2	950
A193B301	.6	800	0	2	185	0.12	2	380
A194B196	1.79	1750	8		20251	0.83	2	3402
A194B231	.73	1750	8		18716	0.89	2	925
A194B229	1.04	800	2	2	238	0.15	2	0
A195B196	.39	800	2	2	603	0.38	2	0
A195B297	1.04	800	0	2	10	0.01	2	659

TABLE PM-3  
(CONTINUED)

A198B199	2.4	1000	2	4	2022	0.51	10	3954
A199B200	1.56	1000	2	4	2721	0.68	10	2570
A200B226	.91	800	0	4	1808	0.57	2	1153
A200B202	1.04	800	4	4	796	0.25	2	0
A200B201	.8	800	2	4	1892	0.59	2	567
A201B205	.8	800	2	2	110	0.07	2	0
A202B204	.52	800	4	4	960	0.30	2	0
A202B224	.83	800	4	4	165	0.05	10	0
A203B204	1.15	800	4	4	2000	0.63	2	0
A203B206	.01	800	2	2	1457	0.91	2	0
A204B212	.52	800	4	4	1901	0.59	10	0
A205B207	1.83	800	0	2	110	0.07	2	1159
A205B206	1.4	800	2	2	0	0.00	2	0
A206B207	2.5	1000	2	2	800	0.40	10	0
A206B210	.68	800	2	2	1072	0.67	2	0
A208B210	.31	800	2	4	1900	0.59	2	196
A210B212	1.41	800	2	2	829	0.52	10	0
A212B214	.14	800	4	4	2728	0.85	10	0
A214B234	1.11	800	4	4	1165	0.36	10	0
A214B216	.36	800	4	6	4188	0.87	10	593
A214B236	.25	800	4	4	2097	0.66	10	0
A216B218	.31	800	4	6	3492	0.73	10	511
A218B332	.48	800	4	8	4675	0.73	2	608
A218B234	1.15	800	2	4	1544	0.48	2	729
A218B220	.31	800	2	6	2987	0.62	2	393
A220B222	.31	800	2	10	6004	0.75	2	786
A222B224	.63	800	2	2	356	0.22	2	0
A222B223	.13	800	2	8	5648	0.88	2	247
A223B228	.13	800	2	8	5595	0.87	2	247
A224B226	.83	800	2	2	521	0.33	2	0
A225B226	.46	800	0	2	291	0.18	2	291
A226B227	.26	800	2	4	2457	0.77	2	165
A227B229	.26	800	2	8	5077	0.79	2	494
A228B230	.63	1750	8		16053	0.92	2	399
A228B231	1.2	1750	8		18984	0.90	2	1521
A229B231	.33	800	0	8	4839	0.76	2	836
A230B332	.2	800	4	8	4675	0.73	2	253
A230B233	.9	1750	8	8	10908	0.78	2	0
A230B310	.6	800	2	10	6263	0.78	2	1521
A232B334	.2	800	2	8	4948	0.77	2	380
A232B233	.9	1750	8	8	8864	0.63	2	0
A232B252	.99	1750	8	8	6563	0.47	2	0
A232B287	.15	800	2	4	2032	0.64	2	190
A233B336	.1	800	0	0	0	0.00	2	0
A233B277	1.25	800	0	6	3460	0.72	2	2376
A234B334	.7	800	2	8	4948	0.77	2	1331
A236B238	1.35	800	4	4	0	0.00	10	0
A236B242	2.1	1000	2	4	2097	0.52	10	3459
A238B240	1.15	800	4	4	548	0.17	2	0
A240B248	1.25	800	4	4	0	0.00	2	0
A240B244	.99	800	2	2	1348	0.84	2	0
A240B252	2.03	1100	2	2	800	0.36	2	0
A242B244	.68	800	2	2	1305	0.82	2	0
A244B246	1.3	1100	2	2	108	0.05	2	0
A246B248	1	800	2	2	0	0.00	2	0
A248B250	2.65	800	2	2	0	0.00	2	0
A250B252	1.41	1750	8	8	6147	0.44	2	0
A251B252	.01	1100	4	4	624	0.14	2	0
A251B285	.55	800	2	4	624	0.20	2	0
A254B265	.16	800	0	2	1515	0.47	.5	71
A263B265	.89	1000	0	2	1515	0.76	.5	395
A283B235	.65	800	4	4	531	0.17	2	0
A332B336	.9	800	0	0	0	0.00	2	0
A334B336	.9	800	0	0	0	0.00	2	0

TABLE PM-3  
(CONTINUED)

The proposal and discussion of mitigating measures were done in the absence of an adopted county transportation plan which would describe goals and policies for meeting transportation needs. Also not available were policies for transit and ridesharing measures which could reduce the peak hour travel volumes in 2005 and thereby reduce the need for some of the additional travel lanes. For these reasons, the following mitigating measures should be based eventually on a comprehensive transportation planning process as proposed below rather than just on a forecast of travel needs.

Three types of mitigating measures are proposed to alleviate the negative traffic impacts of the Las Positas project; they are a transportation planning study, a transportation system management (TSM) program, and physical improvements to freeways, arterials, and intersections to increase their capacity. Only the last of these three can be quantified in terms of minimizing negative impacts, but all three are needed if Alameda County is to cope successfully with the future travel demands to be placed on it by Las Positas and other developments.

#### **Transportation Planning Study**

In order to anticipate the need for highway capital facilities, and to provide for their orderly construction and financing, Alameda County should undertake a county-wide transportation study. Such a study would have as its goals the establishment of a complete and reliable data base, the forecasting of new developments and future travel demands, the consideration of alternative ways in which to meet these demands, and the preparation of a long-range facilities plan and a mid-range capital improvement and financing program. A long-range transportation plan, updated periodically, would give Alameda County an adopted policy on future transportation needs and facilities against which to measure the impacts of development proposals such as Las Positas.

While an adequate long-range plan could cost several hundred thousand dollars, there may be funds available from non-county sources to support much of that cost. Federal funds from the U.S. Department of Transportation and state funds from Caltrans could be requested for planning the parts of the transportation system that are federal and state responsibility. Major developers may also be asked to contribute to a planning study at some rate scaled to the size of developments being proposed.

A comprehensive transportation planning study for Alameda County would include substantial work on the following tasks:

- Intergovernmental liaison with state, regional and local agencies involved in county transportation facilities and services.
- Public involvement and citizen review of the study design and products.



- Development of goals and objectives for the county transportation plan.
- Inventory of transportation facilities and travel characteristics.
- Calibration of an appropriately detailed travel model (based on work done by Wilsey & Ham for this EIR).
- Forecast of growth in population, employment, and travel based upon alternative land use scenarios (updated from work done by Wilsey & Ham for this EIR).
- Identification of issues and problems.
- Identification of both capital and operational alternatives that may solve travel problems (based on mitigating measures proposed by Wilsey & Ham in this EIR).
- Testing and evaluation of alternatives and their implementation costs.
- Selection of an optimal alternative and preparation of an implementation and financing program.
- Periodic updating of the plan and program based on growth trends and current problems.

Within this analysis of Las Positas traffic impacts, a suitable long-range transportation plan for Alameda County cannot be developed; but the project offers the county an opportunity to prepare such a plan itself with the assistance of qualified professional specialists and the input of the various local government entities affected. The county should designate its own staff members to manage and direct the study, in order to ensure responsiveness to its needs.

### **Transportation System Management Program**

A second measure needed to mitigate the adverse impacts of Las Positas traffic is a county-wide transportation system management program which would be designed to ensure the operation of the highway systems more efficiently, to make low-capital, cost-effective improvements to the highway system, and to lessen or reshape the peak-hour travel demands placed on the highway system. Such a program, to be effective, should be conceived and implemented on a widespread geographical basis, so that regional trips may benefit from it as well as local trips.

Transportation system management (TSM) measures are encouraged and supported by the Federal Highway Administration of the U.S. Department of Transportation, and have been undertaken in many urbanized areas. The costs of many of the measures are eligible for federal financial assistance. Caltrans experience with successful measures should be solicited and used as guidelines.

Important TSM measures that would help to relieve future transportation problems in Alameda County, including those that would be affected by Las Positas, are as follows:

- A ridesharing program, to increase auto occupancy at peak hours. Cooperation from major employers and developers in the county is essential. Ride-match services can be offered at several locations, and incentives offered to make carpooling more convenient and efficient.
- Flexible work hours, so that the peak-hour demands for auto travel are spread over a longer period of time. Cooperation is needed from major employers in the county to institute such a measure.
- Carpool preference facilities, to provide incentives to commuters in carpools. These include high occupancy vehicle (HOV) lanes on freeways and arterials, ramp bypass lanes, and preferential parking spaces at reduced cost. Transit vehicles can also benefit from HOV lanes.
- Freeway ramp metering, so that mainline freeway flows are not disrupted by the sudden entrance of large volumes of vehicles from an on-ramp. A well-controlled, interactive system of ramp metering can increase mainline capacity as much as ten percent, achieving lane volumes of 2,000 or more cars per hour\*. A computerized freeway ramp metering system can sense the volume and speed of traffic on the mainline and the queue of vehicles waiting to enter at a ramp. Vehicle entrance to the mainline from the ramp is controlled by a traffic light, whose timing is varied by a central computer according to the unused capacity on the freeway and the demand for that capacity from waiting vehicles. Transit and high occupancy vehicles can often use a bypass lane for preferential treatment.
- Transit facilities and services oriented to work trip destinations. Public transit service should be designed and marketed in Alameda County so that increased transit ridership would reduce peak-hour traffic. Subscription bus service and express service can be designed to meet commuters' needs.

These and other TSM measures do not fully replace specific physical improvements to the road system, but collectively they can increase system efficiency and ease the demand for auto facilities. The key to a successful TSM program is its organization on a county-wide basis and its orientation to peak-hour travel problems, under the direction of county staff. Aggressive program design and marketing, and close liaison with state and transit agencies can produce system-wide traffic benefits to Alameda County.

\*Based on current experience of Washington State Department of Transportation in Seattle with the I-5 FLOW system. The local streets in north Seattle did not show increase in traffic volumes, according to a preliminary report because of the increased capacity of the freeway lanes.



## Road Improvements

Adverse traffic impacts of the Las Positas project can also be mitigated by improvements to the regional road system. The impacts of expected growth in traffic volumes from 1983 to 2005 were used to establish the needs for additional arterial and freeway lanes, intersection approach lanes, freeway interchanges and ramps and weaving lanes that would serve traffic growth expected over the next 22 years. Such additional facilities are termed mitigating measures, since they would relieve the adverse traffic impacts associated with regional growth and with the Las Positas project, and permit peak-hour traffic operations at LOS D or better.

The process by which the mitigating measures were developed and costed is based on the systems analysis work described previously. For each freeway and arterial segment, both existing and proposed, the number of lanes was compared to the number of lanes needed to carry 2005 traffic, without and with the Las Positas project. To these extra lane requirements were applied representative costs for right-of-way and construction appropriate to the urbanization of the area in question. Arterial intersections were evaluated for levels of service, and the need for additional approach lanes to maintain a LOS D was determined.

The turn volumes at ramps on and off I-580 were calculated and analyzed for capacity and needed widenings of ramps and mainline segments. Ramp and weaving needs led to the proposal of an alternative design concept involving a collector-distributor road on each side of I-580 from N. Livermore to I-680, to be integrated with the I-580/I-680 and Dublin interchanges at its western terminus. Also examined was a conventional improvement to I-580.

Based on the analysis of highway links presented in the section of this report on traffic impacts, the mitigating measures deal with the following categories of measures: improvements to existing arterials; construction of new arterials; improvements to arterial intersections; and improvements to the I-580 freeway, both mainline and ramps.

All of the proposed improvements are based on the need for a LOS D traffic operation in 2005. The volumes of traffic forecasted in this report for 2005 -- both without and with the Las Positas project -- represent a "worst case" scenario, in that all peak-hour travel is assumed to be in autos with a typical suburban level of vehicle occupancy. Realistically, as growth occurs over the next twenty years, both transit and transportation system management facilities and services will help to reduce the traffic volumes from those forecasted in this report. As a result, the road improvements proposed here



as mitigating measures will be scaled back in order to be consistent with traffic volumes.

For each category, the specific improvements for the mitigating measure being proposed are discussed in terms of needs, feasibility and costs. Feasibility is based on the physical ability to provide the needed capacities in the appropriate locations which may be on the arterial routes themselves or near to the arterials in the same travel corridors. Costs of the mitigating measures are based on typical unit costs of right-of-way and construction, and on typical design.

#### Existing Arterials

The numbers of lanes needed on existing arterials in 2005 for LOS D without and with the Las Positas project are listed in Tables PM-1\* and PM-3.\* These numbers are used in Table IX as the proposed mitigating measures. Each existing arterial that shows an increase over 1983 in the number of lanes needed for LOS D is listed by segment, with the total number of lanes needed for LOS D and the typical cost for such an expansion. While the numbers of total lanes includes both existing lanes and future needs, the cost figures are only for the needed expansion of the existing facilities.

For the most part, the lane requirements for the arterials listed can be provided by acquiring additional right-of-way and widening the existing pavement. The cost calculations are based on these actions. In a few cases, certain widenings are not practical since they would remove homes and businesses; however, there are alternatives that may be more acceptable to the community. These cases are described below.

\*Because the traffic volumes in the PM peak travel hour are greater than in the AM peak travel hour, the lane requirements for LOS D in the PM peak are used to determine the mitigating measures.

**TABLE IX**  
MITIGATING MEASURES FOR EXISTING ARTERIALS

Facility	Limits	Existing (1983) Total Lanes	Without Las Positas Cost in		With Las Positas Cost in	
			Total Lanes	000's \$	Total Lanes	000's \$
Sycamore -	San Ramon to I-680	2	6	127	6	127
	I-680 to Tassajara	2	8	1,977	6	1,318
Alcosta -	San Ramon to I-680	4	6	82	6	82
	I-680 to Old Ranch	2	6	1,711	6	1,711
	Old Ranch to Ensenada	2	8	1,388	8	1,388
	Ensenada to Montevideo	2	6	1,014	6	1,014
	Montevideo to Bollinger	2	4	697	6	1,394
	Bollinger to Woodview	2	8	893	8	893
	Crow Canyon to Woodview	4	6	526	4	0
San Ramon -	Amador to Dublin	4	6	511	8	1,021
	Dublin to I-580	6	6	0	8	428
Old Ranch Rd. -	Alcosta to Dougherty	2	4	596	4	596
Crow Canyon -	I-680 to Alcosta	4	6	399	4	0
Tassajara -	I-680 to Sycamore	2	4	1,894	6	3,789
	Tassajara Creek Park to Rehab. Ctr.	2	2	0	4	703
	Rehab. Ctr. to I-580	2	2	0	4	247
Dougherty -	Old Ranch to Bollinger ext.	2	4	1,255	2	0
	Old Ranch to Amador	2	6	2,116	4	1,058
	Amador to Dublin	4	6	494	4	0
	Dublin to I-580	4	8	393	8	393
Bollinger Canyon -	San Ramon to I-680	2	4	133	2	0
	I-680 to Alcosta	2	10	1,597	10	1,597
Amador Valley -	Dougherty to Penn	2	4	317	4	317
Valley -	Hopyard to Crestline	2	6	2,076	6	2,076
	Santa Rita to Crestline	2	4	1,120	4	1,120
Santa Rita -	1st St. to Bernal	2	4	593	4	593
	Sutter Gate to Las Positas Rd.	4	4	0	6	266
	Las Positas Rd. to I-680	4	6	494	4	0
Stanley -	Main to Kottinger	2	6	1,713	6	1,713
	Kottinger to El Charro ext.	2	4	3,954	4	3,954
	El Charro ext. to Isabel	2	4	2,570	4	2,570

TABLE IX (CONTINUED)

Facility	Limits	Existing (1983) Total Lanes	Without Las Positas Cost in		With Las Positas Cost in	
			Total Lanes	000's \$	Total Lanes	000's \$
Airway -	Old Collier Canyon to I-580	2	2	0	4	32
Isabel/Kitty Hawk -	Stanley to Rainier	2	4	507	4	507
	Las Positas Blvd. to east of runway	2	4	165	4	165
	east of runway to Lindberg	2	8	494	8	494
	Stanley to Alden	2	4	507	4	507
Arroyo -	Marina to Concannon	2	4	196	4	196
Livermore -	Tesla to East	2	4	3,459	4	3,459
	First to Walnut	4	6	593	6	593
	Walnut to Portola	4	4	0	6	511
	Portola to Las Positas Rd.	4	8	608	8	608
	I-580 to Las Positas Rd.	4	8	253	8	253
	I-580 to edge of project	2	2	0	10	1,521
Portola -	N. Livermore to First	2	4	729	4	729
	N. Livermore to Alviso	2	4	196	6	393
	Alviso to Murrieta	2	8	589	10	786
	Murrieta to south of I-580	2	8	247	8	247
	south of I-580 to I-580	2	8	247	8	247
First -	I-580 to Las Positas Rd.	2	4	127	8	380
	Portola to Las Positas Rd.	2	4	444	8	1,331
Manning -	Highland to N. Livermore	2	2	0	4	71
Springtown -	I-580 to Bluebell	2	2	0	4	190
TOTAL				\$40,001		\$43,588

Sycamore - From I-680 to Tassajara, the residential development on each side makes widening difficult, and there is no nearby alternative route. As an access to I-680, the arterial carries heavy traffic. Some of this traffic may be redirected onto the Crow Canyon Road extension and on to routes further north to remove some of the through traffic volumes.

Alcosta - The heavy volumes predicted for Alcosta require six lanes, except between Old Ranch and Ensenada where eight lanes may be needed.



While some widening is possible, full widening to meet travel demand will be difficult because of residential uses on each side of the road. If traffic volumes grow as predicted, then consideration should be given to the development of the Southern Pacific right-of-way as a limited access arterial between Crow Canyon Road and Alcosta, or possibly to Dougherty to the south. This route has also been suggested by TJKM as a possible route for a light-rail line. Transit use of the railroad alignment would serve to reduce the demand for auto travel in the Alcosta corridor. It should be possible to develop arterial capacity for autos in the first instance, and then to convert the road to light rail usage later, if deemed appropriate.

Tassajara - From I-680 east to Sycamore, widening to four or six lanes (without or with Las Positas) may be difficult because of residential development on each side of the road, similar to Sycamore. A possible alternative would be to divert traffic to an extension of Crow Canyon Road eastwards to Dougherty. This would provide freeway access through a corridor that is capable of accommodating high traffic volumes.

Dougherty - The section between Dublin and I-580 appears to need widening from four to eight lanes, but is restricted by development on each side and by ramp connections to I-580. Use of a collector-distributor road (see freeway section) and a reconstruction of the interchange may be needed to provide adequate capacity.

Livermore - A serious problem would be encountered if Livermore Avenue were to be widened to accommodate predicted traffic. The six lanes needed from First to Portola, and the eight lanes from Portola to Las Positas Road would cause considerable disruption if widenings were accomplished on the present alignment. An alternative that should be investigated is the use of L Street as a one-way southbound street in conjunction with Livermore as a one-way northbound street between First and Portola. This would increase traffic capacity north and south through the middle of Livermore without the need for widening pavements.

The eight lanes needed on N. Livermore from I-580 to Portola can probably be handled through judicious widening of the existing pavement; however, a cemetery and park on the west side of the road and a

subdivision on the east side may require a curvilinear alignment to take advantage of the clear areas where widening can occur.

Portola - While requiring substantial widening to carry predicted traffic, it appears that Portola may be able to accommodate the extra lanes on its northeast side as far south as L Street. If a N. Livermore-L Street couplet is developed, then the southbound traffic on Portola would divert to L Street.

The other mitigation measures recommended for existing arterials do not appear to pose problems in their implementation. From the inspection of aerial photographs, maps and field checks, it appears that the proposed widenings can be accomplished without substantial disruption.

#### New Arterials

In addition to the improvements to existing arterials listed above because of area-wide growth (including Las Positas), there will be a need for several new arterials in the study area to carry the traffic in 2005. These new arterial links are shown as dotted lines on Figure 4 series of maps and are listed in the link analyses table as having zero lanes in 1983. The new arterial links are listed in Table X, without and with the Las Positas project. New roads located within the Las Positas project are not listed here since they are part of the project and have no meaning in the "without Las Positas" case.

New arterial link data from Tables PM-1 and PM-3 are listed in Table X for comparison purposes between the "without Las Positas" and the "with Las Positas" cases. The cost figures are based on typical right-of-way and construction costs as before; however, an additional right-of-way cost is added to the figures from the tables to represent the additional width needed as a buffer between the traffic lanes and the abutting private property. There are several cases where new arterial links were included in the network, but almost no traffic was assigned to them. Those links are also listed with a notation "not used" in the appropriate column. The presence of these unused links in the network did not affect the traffic volumes forecasted on other links.

**TABLE X**  
MITIGATING MEASURES FOR NEW ARTERIALS

Facility	Limits	Without Las Positas		With Las Positas	
		Total Lanes	Cost in 000's \$	Total Lanes	Cost in 000's \$
W. Las Positas Blvd. -	Foothill to I-680	2	1,730	0	0
	I-680 to Hopyard	6	4,585	6	4,585
	Gulfstream to Hacienda	4	2,247	4	2,247
	Hacienda to El Charro	4	2,528	4	2,528
	El Charro to Kitty Hawk	2	2,482	2	2,482
Bollinger Canyon -	Alcosta to Dougherty	6	2,613	6	2,613
	Dougherty to Tassajara	4	3,875	4	3,875
Crow Canyon -	Alcosta to Dougherty	not used		not used	
Hacienda -	Stoneridge to Las Positas	2	517	2	517
	Stoneridge to I-580	2	687	4	1,099
New Collier Canyon -	Hartman to I-580	2	803	2	803
El Charro -	Las Positas to I-580	4	777	4	777
	Las Positas to Stanley	2	1,932	2	1,932
Isabel/Kitty Hawk -	Stanley to Las Positas	4	1,537	4	1,537
	SR 84 to E. Vineyard	not used		not used	
	Lindberg to I-580	6	766	8	975
Dublin -	Dougherty to Tassajara	not used		not used	
	El Charro to Tassajara	not used		not used	
	Dublin to El Charro	not used		not used	
	Dublin to Hartman	not used		not used	
Hartman -	New Collier Canyon to Airway	not used	4		676
Airway -	Dublin to Hartman	not used	4		1,013
Lorraine -	I-580 to Dalton	not used	6		2,904
TOTAL			\$27,079		\$30,563



The new links are based in part on new projects mentioned in the TJKM report such as the Las Positas Boulevard extension and the I-580/Hacienda interchange. Other new links are those associated directly with the Las Positas project, such as Hartman Road and Lorraine Street. These new arterial facilities and others should be evaluated more thoroughly in a comprehensive transportation planning process. However, from the standpoint of this report, the facilities appear to be physically feasible and consistent with the patterns of development in the Tri-Valley part of Alameda County.

### Arterial Intersections

Because of increased traffic volumes forecasted on the arterial road system in 2005, many arterial intersections will need to be improved by the addition of approach lanes designed to accommodate turning vehicles. The total number of needed approach lanes has been calculated, both without and with the Las Positas project, based on the traffic volumes approaching each intersection of interest, the desired level of service (LOS D) or a v/c ratio of 0.90. The Technical Appendix reports on the development of the equation used, and the standard error of the regression equation.

Twenty-eight arterial intersections are listed in Table XI, each showing the approach volumes, total number of approach lanes needed, the resultant ratio of volume to capacity, and the improvement cost in 2005 with and without the Las Positas project. The traffic volumes used are from the PM peak hour assignments, since they place the greatest demands on the road system. The cost calculations are based on typical dimensions and unit costs; lane needs are in addition to through-traffic travel lanes already present or proposed earlier as mitigating measures for existing or new arterials.

### I-580 Freeway

The population and employment growth in the Livermore-Amador Valley will require that I-580, the main east-west traffic artery, be expanded by 2005, with or without Las Positas. Using the PM peak hour assignments, with and without Las Positas, the capacity of lane requirements were determined for three alternate freeway configurations.

The three alternates describe three possible ways of accommodating traffic on I-580. They were not analyzed in detail but are shown only to describe the range of possibilities. A much more detailed evaluation, beyond the scope of this analysis, is required to determine the actual freeway and interchange configuration. The diagrams are for descriptive purposes only, and are not to scale. Interchanges are probable configurations that can accommodate the projected traffic. It is further assumed that the lane capacity on I-580 is 1,750 vehicles per lane per hour to maintain LOS D.

**TABLE XI**  
MITIGATING MEASURES FOR ARTERIAL INTERSECTIONS

Intersection	Existing (1983) Approach Lanes	Approach Volumes		Approach Lanes Needed		Volume/ Capacity		Cost in* 000's \$	
		With- out/	With	With- out/	With	With- out/	With	With- out/	With
Dublin & San Ramon	5	5,412	5,754	19	20	.85	.86	78	117
Dougherty & Tassajara	3	691	1,161	4	4	.29	.47	0	0
Amador & Dougherty	4	5,526	5,046	19	17	.87	.86	135	105
Dublin & Dougherty	6	5,029	5,044	17	17	.86	.86	90	90
Stoneridge & Hacienda**	4	1,594	2,007	4	4	.62	.73	0	0
Hacienda & W. Las Positas	6	860	908	4	4	.36	.38	0	0
Hopyard & W. Las Positas	6	5,596	5,384	20	19	.84	.84	0	0
Santa Rita & W. Las Positas	8	4,371	4,374	14	14	.86	.86	78	78
Highland & Tassajara	3	749	2,271	4	4	.31	.80	0	0
New Collier Canyon** & Hartman	2	481	2,845	4	6	.18	.86	0	0
El Charro** & Las Positas**	0	1,863	3,058	4	8	.69	.83	0	0
El Charro** & Stanley	4	2,404	2,890	4	7	.84	.83	0	0
Isabel & Stanley	4	3,058	3,609	8	11	.83	.83	0	0
First & Stanley	6	2,229	2,431	4	4	.79	.86	0	0
Concannon & Holmes	3	1,616	1,665	4	4	.62	.64	0	0
SR 84 & Isabel**	4	853	910	4	4	.36	.38	0	0
First & N. Livermore	6	4,898	5,089	17	18	.84	.83	156	195

TABLE XI (CONTINUED)

Intersection	Existing (1983) Approach Lanes	Approach Volumes		Approach Lanes Needed		Volume/ Capacity		Cost in* 000's \$	
		With- out/	With	With- out/	With	With- out/	With	With- out/	With
Portola & N. Livermore	6	5,759	6,349	20	23	.86	.84	0	0
Portola & Murietta	18	5,266	6,004	18	21	.86	.86	0	45
Las Positas & Murietta	6	638	521	4	4	.26	.20	0	0
Las Positas & Kitty Hawk	4	2,271	2,539	4	4	.80	.87	0	0
First & Portola	4	6,436	7,496	23	27	.85	.85	105	165
East & S. Livermore	5	1,867	2,097	4	4	.70	.76	0	0
East & Vasco	4	1,138	1,348	4	4	.47	.54	0	0
Tesla & Mines	3	2,861	3,396	6	9	.87	.87		
Tesla & Vasco	3	1,058	1,381	4	4	.44	.55	0	0
Tesla & Greenville	3	89	108	4	4	N/A	N/A	<u>0</u>	<u>0</u>
TOTAL								\$642	\$795

\*Added costs in addition to widening costs shown in Tables IX and X.

\*\*Approach lanes do not exist in 1983.

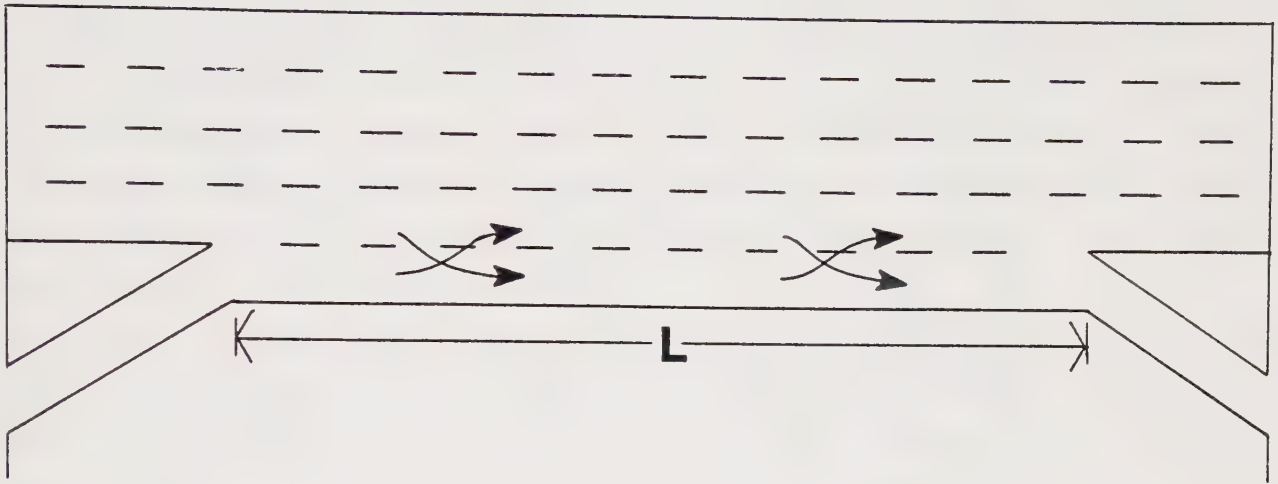
Design concept one (Figure 5a) shows the number of lanes on I-580 to accommodate the additional traffic with Las Positas. All traffic enters and exits the freeway proper, requiring substantial weaving. Table XII shows the total number of lanes needed with and without Las Positas on each freeway link.

In order to conduct the weaving analysis, the technique outlined in Transportation Research Circular 212, "Interim Materials on Highway Capacity," was used. The analysis assumed that all weaves in and out of the freeway mainstream were Type II major weaves. A fifth auxiliary lane configuration is shown in Figure 5b. The additional lane is continuous between interchanges to permit entering and exiting traffic to weave the entire distance.



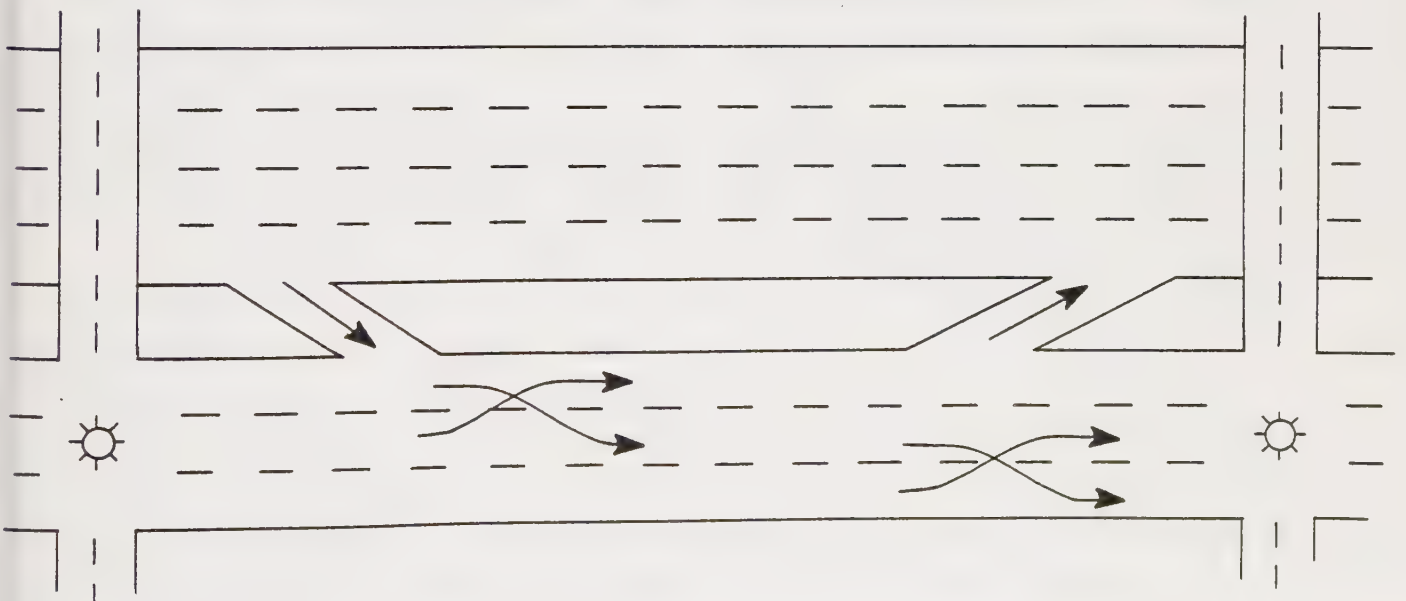
**fig. 5b**

**Weaving using Auxiliary Lane**



**fig. 5c**

**Weaving using Signalized Collector-Distributor Road**



**TABLE XII**  
**MITIGATING MEASURES FOR I-580 FREEWAY**

Freeway Segment	Without Las Positas	With Las Positas
First St. to N. Livermore Ave.	8	8
to Portola Ave.	8	10
to Kitty Hawk Rd.	10	14
to Airway Blvd.	12	14
to El Charro Rd.	12	16
to Santa Rita Blvd.	14	16
to Hacienda Blvd.	12	16
to Hopyard Rd.	12	16
to I-680	12	12

The lane requirements for the PM peak with Las Positas is shown in Figure 5a and shows the number of lanes required to move the traffic volumes at a minimum speed of 40 miles per hour (LOS D) for both weaving and non-weaving traffic. The lane requirements vary from four to eight lanes in each direction depending on the traffic volumes. If five or less lanes are necessary the schematic configuration shown in Figure 5b is sufficient to accommodate weaving traffic. If six, seven or eight lanes are required some type of collector-distributor road (shown schematically in Figure 5c and described in design concept two, Figure 5d) will be necessary to accommodate entering and exiting traffic. Even without Las Positas there will be additional lane requirements on I-580 due to general population and employment growth in the area.

One factor in the weaving analysis is that almost all of the links are "constrained," i.e., the weaving volumes are such that they are greater than the natural balance of the lanes to accommodate them. This results in greater congestion and lower speeds in the weaving lanes. In many cases through lanes will have much higher speeds than the weaving lanes. The lane requirements are the number of lanes necessary for traffic to maintain a minimum speed of 36 mph in the weaving lanes. To accommodate weaving traffic using this freeway configuration, approximately one additional lane is required

in each direction over and above the normal lane requirements for traffic. Additionally, the Las Positas increment will require, in general, an additional lane over and above the lanes necessary to handle normal population and employment growth. This requirement extends from Hopyard Road to Portola Avenue. Additional lanes are not required, with or without Las Positas, east of Portola Avenue.

Design concept two, shown in Figure 5d, shows the I-580 freeway with a signalized collector-distributor road from I-680 to North Livermore Avenue. Entry and exits to the freeway is via slip ramps between the freeway proper and the collector-distributor road. The interchanges are eliminated. All left and right turns are made at signals. Even with this system up to seven lanes in each direction are required along I-580. With a few exceptions, a two-lane collector-distributor can handle all entering and exiting traffic. Lane requirements are slightly reduced from Alternate 1 but I-580 must still accommodate the bulk of the traffic.

Design concept three, shown in Figure 5e, describes a dual freeway system. The current I-580 becomes a restricted access system between North Livermore Avenue and I-680 and maintains its present four lanes in each direction. Added to this on either side are limited access freeway lanes. With certain exceptions all the present and proposed interchanges will use the outer freeway system. Figure 5e shows the interchange volumes for the PM peak hour in 2005 with and without Las Positas and the link volumes and lane requirements in each direction with Las Positas only for the 2005 PM peak hour.

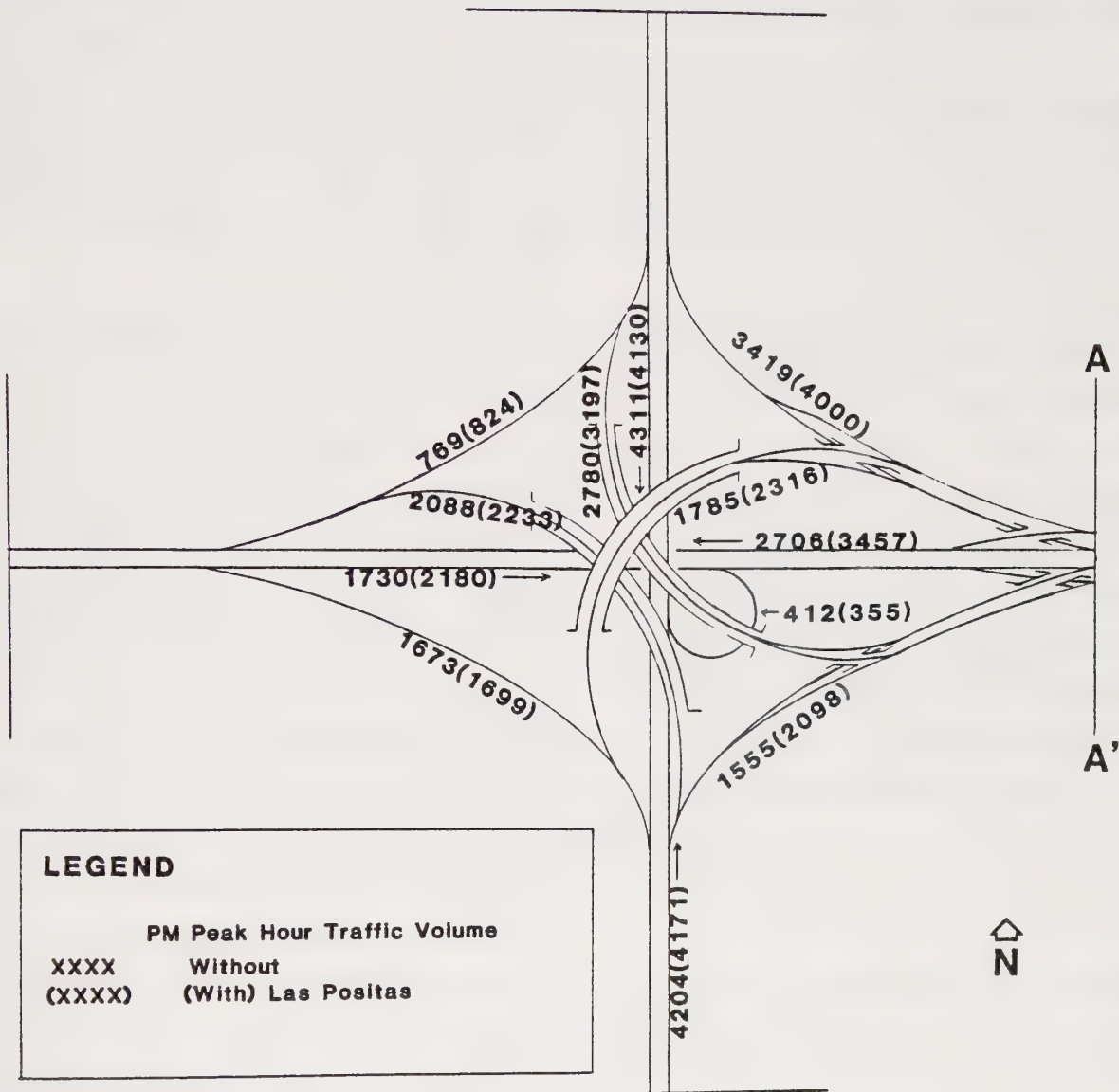
In general the proposed system does not permit access to the center lanes of I-580 between Portola Avenue and I-680. All traffic entering and exiting the freeway between Portola and I-680 will be required to remain on a separate limited access system built to freeway standards.

Westbound traffic will be initially separated at Portola Avenue. The addition of turning traffic from North Livermore will fill the center westbound lanes to capacity and require a fifth auxiliary lane between North Livermore Avenue and Portola Avenue. Mainline traffic wishing to exit at Kitty Hawk Road, Airway Boulevard or El Charro Road will exit to the outside freeway road at Portola Avenue. All other traffic entering or exiting between Portola Avenue and Hopyard Road will remain on the outside freeway facility. Mainline traffic wishing to exit at Santa Rita Road, Hacienda Boulevard or Hopyard Road will exit at a slip ramp near El Charro Road. There will be no access to the four center lanes between Portola and I-680. At I-680 both the outside freeway and the main freeway will be merged as shown in design concept four, Figure 5f, for all left, right and through traffic.





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I-580/I-680 INTERCHANGE

Eastbound traffic is essentially the reverse of westbound traffic. At I-680 all traffic can enter either the mainline freeway or the outside freeway. Traffic exiting at Hopyard Road, Hacienda Boulevard, Santa Rita Road or El Charro Road would be required to use the outside freeway. In order to use most effectively the center lanes a slip ramp after Hopyard Road may be necessary to bring the center lanes up to capacity. Mainline traffic exiting at Airway Boulevard and Kitty Hawk Road would exit to the outside freeway near El Charro Road. All traffic from either the mainline or the outside freeway could exit at Portola Avenue or North Livermore Avenue and through traffic would remerge with the mainline freeway. This system is not necessary east of North Livermore Avenue.

Although design concept three is a preliminary possibility only, it has been shown that this alternate is workable, based on lane capacity requirements.

The freeway alternative based on expanding the I-580 facility in its present design configuration would function adequately with up to six mainline lanes in each direction from Livermore to I-680, with one or two auxiliary lanes between interchanges to facilitate entering, weaving, and exiting vehicles. The auxiliary lanes would not be continuous lanes, but would connect the ramp entrance lanes at one interchange to the ramp exit lanes at the next interchange.

Alternatively, the I-580 freeway traffic volumes could be accommodated through the use of parallel collector-distributor roads which serve to isolate the arterial interchange traffic from the freeway entering and exiting traffic. Because this alternative is able to maintain higher lane capacities on the mainline of the freeway, fewer lanes may be required in some sections.

The estimated overall cost to improve I-580 to accommodate future traffic depends greatly on the availability of right-of-way, the design standards used, the alternative design employed, and the ability to use parts of the existing facility. It appears that the total improvement costs, including right-of-way, would be between ninety and one hundred and twenty million dollars. Because all the improvements (except for the ramps at Lorraine Street) would be to increase the capacity of the freeway, their costs would be eligible for support by state and federal funds.

The detailed traffic volumes forecasted in 2005 on I-580, both mainline and ramps, are reported in the Technical Appendix. Also included in the Appendix are diagrams of ramp configurations and numbers of lanes needed to produce a LOS D in 2005 for the traffic volumes with and without Las Positas.



## **Feasibility of Mitigating Measures**

The improvements needed to freeways, arterials, and intersections to attain LOS D in 2005 involve much widening and new construction in the study area. As referenced earlier, these improvements are but one way to achieve a satisfactory level of service in the peak hour of weekday travel.

The feasibility of these mitigating measures should be examined from physical, social, and fiscal viewpoints. Physically, each of the mitigating measures can be built. There are no physical problems such as grades, bodies of water, intersection spacing or soils that would prevent any of the improvements from being made.

From a fiscal point of view, the costs of the mitigating measures for arterials will represent a significant part of the capital improvement budgets of Alameda County and the cities in the study area over the next twenty years. The fiscal impact analysis considers this subject in more detail.

The social impacts of these measures, expressed in terms of increased traffic, possible takings of homes and businesses, and disruptions due to construction, could have a considerable effect on residents of the area. Many of the adverse impacts would be caused by projects needed to accommodate the normal traffic growth expected without the Las Positas project. Without a program of public information and involvement associated with a comprehensive transportation planning effort, the social impacts of these measures cannot be well-estimated. The tradeoffs among growth, accessibility, congestion, stability and quality of life in the area for its residents can only be ascertained by planning for the future in Alameda County.

## **Economic Impact of Las Positas**

The total estimated cost of all improvements to the arterial system needed in 2005 with the Las Positas project in place is about \$72,000,000 in current dollars. The costs of acquiring whatever homes and commercial buildings that may be unavoidable for widenings of existing arterials will be minimal and is included in the previous amount. Of this amount, about \$65,000,000 in improvement costs are needed without Las Positas. About 10 percent of the total arterial improvement costs are attributable to Las Positas.

The total estimated cost of the improvements needed to the I-580 freeway ranges between \$90 million and \$120 million. For this range, between \$36 million and \$48.5 million is the cost impact of the Las Positas project, based on the incremental facility improvements needed to accommodate the 2005 traffic with Las Positas.

The earlier DEIR described a logical first phase of highway improvements that are related to the Las Positas development. It is described below.

Phase I (assumed completed by 1990)

- Widen N. Livermore Avenue, north of I-580, to a four-lane divided arterial, with extra turn lanes at major intersections.
- Widen the eastbound off-ramp at the N. Livermore Avenue/I-580 interchange to two lanes in order to provide additional storage for vehicles exiting the freeway and turning northward to Las Positas. A one-lane connection to the freeway would be sufficient for the ramp during Phase I. However, consideration should be given to the ultimate alignment of this as a two-lane ramp for later phases.
- Prepare a traffic report update which addresses the impacts of Phase II development. This update should be prepared during the approval process for Phase II construction, and should include monitoring of Phase I generated traffic. The purpose of this traffic update would be to identify any needed improvements in the downtown area of the City of Livermore as a result of Phase II construction and to establish the amount of Las Positas participation in the Airway Boulevard/I-580 interchange improvements.\* Both of these tasks would be best addressed after traffic data is available from Phase I and the development plans for other projects north of I-580 are farther along in the planning process.
- During the permit process for each component of the proposed Phase I development, consideration should be given to truck routes for construction vehicles. These truck routes should be established by the Alameda and Contra Costa County Public Works Departments to minimize damage to minor streets and create a mechanism for repair, if necessary. This measure also applies to the other phases of the development.

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\*Interchange improvements at Airway Boulevard are included in the Northbluff development plan. Additional widening of the overcrossing will be needed when a connector road is established between the Northbluff area and Las Positas (planned for Phase II). Other developments north of I-580 would also be expected to make use of this facility and contribute to the improvements.

## ACKNOWLEDGEMENTS

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**Richard Etherington & Assoc.:** Transportation Planning, Assistance in Project Management

**David A. Harrell:** Transportation Planning Analysis







# LINK NODE NETWORK





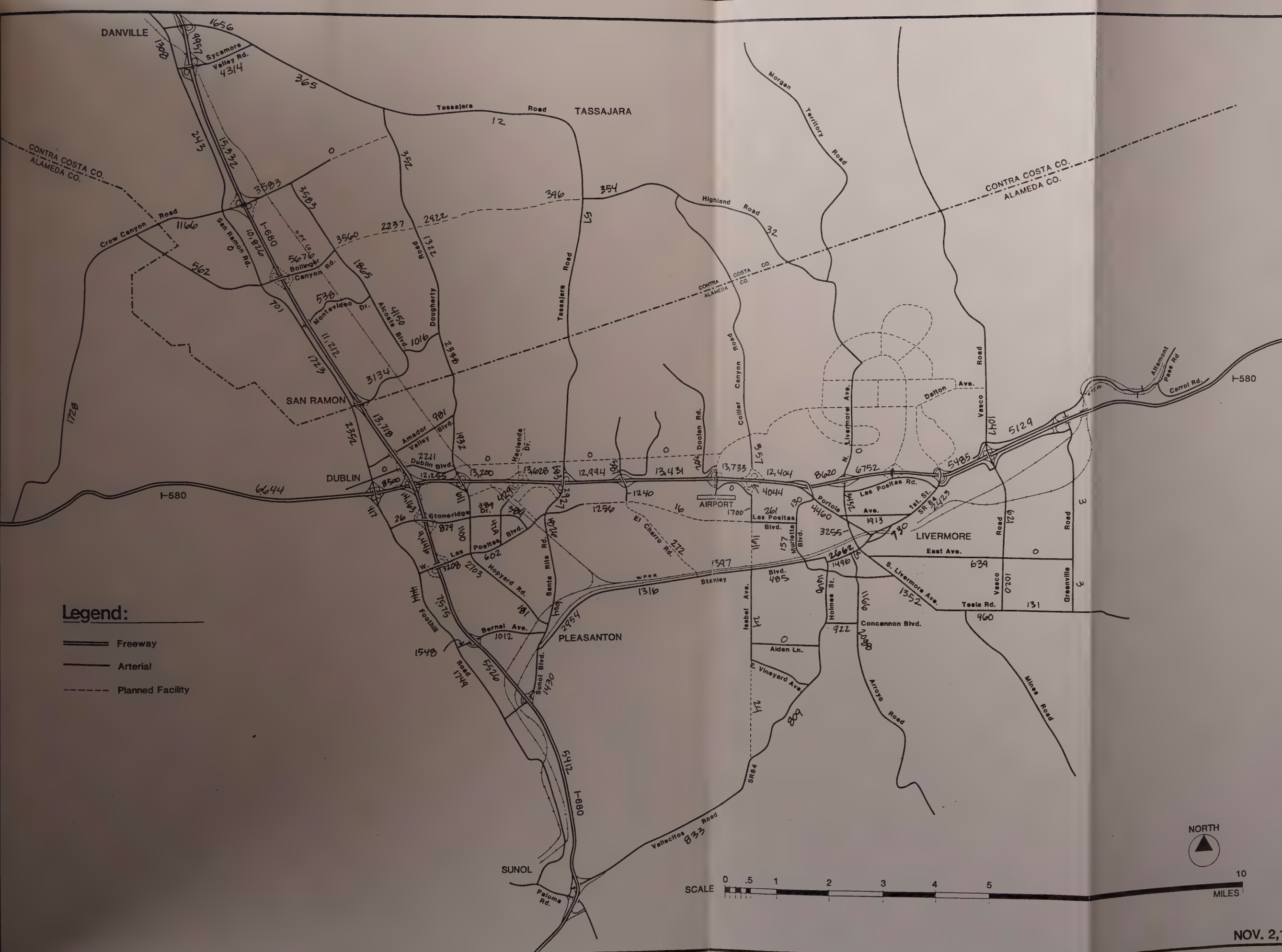
# Las Positas

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## Transportation Analysis

**2005 AM PEAK HOUR TRAFFIC VOLUMES  
WITHOUT LAS POSITAS**

NOV. 2, 1983







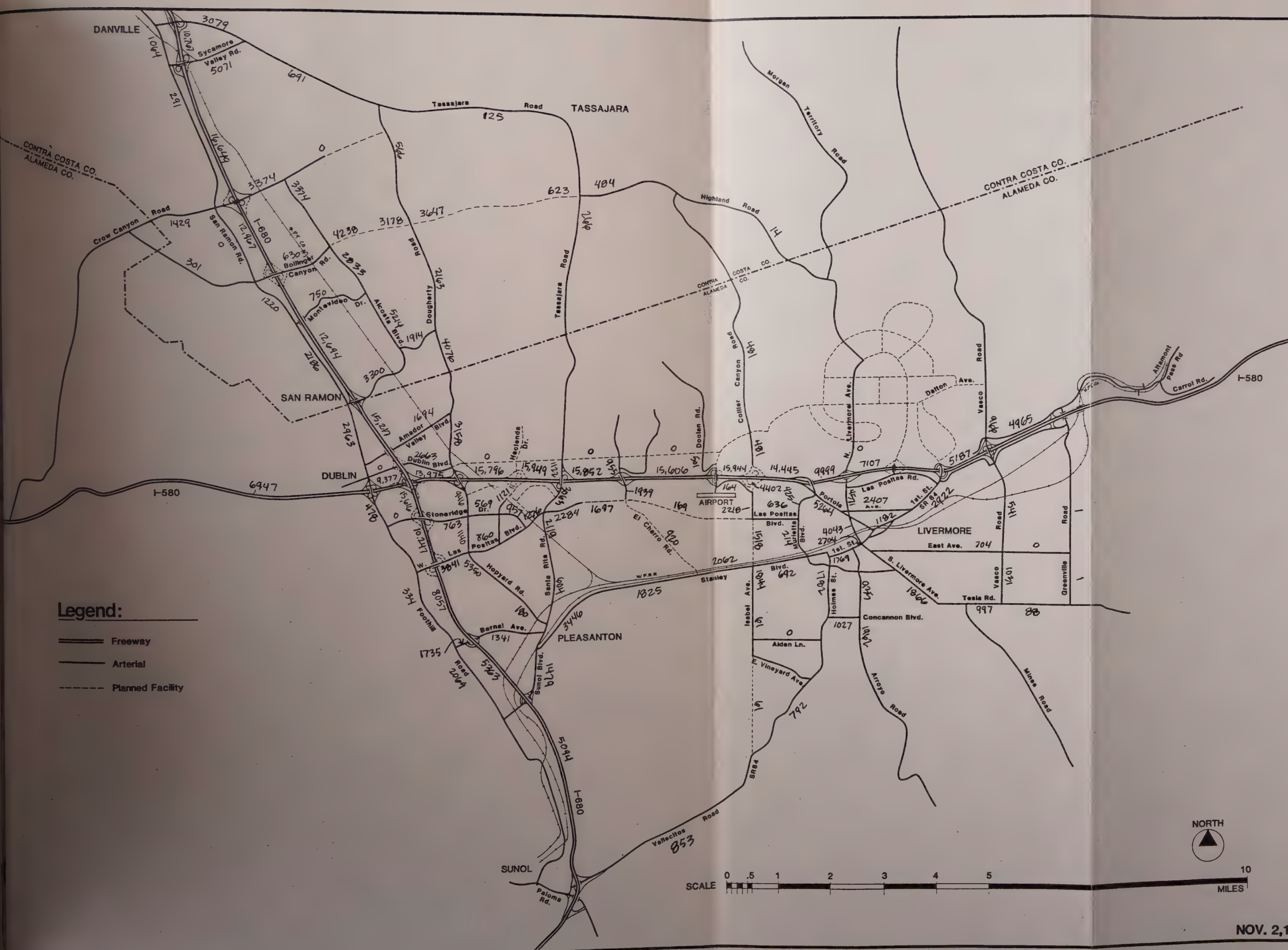
# Las Positas

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## Transportation Analysis

**2005 PM PEAK HOUR TRAFFIC VOLUMES  
WITHOUT LAS POSITAS**

fig.  
4-PM1



NOV. 2, 1983





**fig. 4-AM2**

**DANVILLE**

Sycamore Valley Rd. 4330

TASSAJARA Road

Crow Canyon Road

CONTRA COSTA CO. ALAMEDA CO.

HIGHLAND ROAD

Morgan Territory Road

CONTRA COSTA CO. ALAMEDA CO.

SAN RAMON

DUBLIN

I-580

PLEASANTON

LIVERMORE

SUNOL

I-680

Paloma Rd.

VALLECITOS ROAD

AIRPORT

El Chorro Rd.

Stanley

Isabel Ave.

E Vineyard Ave.

Concannon Blvd.

Arroyo Road

Mines Road

Altamont Pass Rd.

Carroll Rd.

I-580

**Legend:**

- Freeway
- Arterial
- Planned Facility

**SCALE**

0 5 1 2 3 4 5 10 MILES

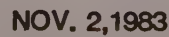
**NORTH**

NOV. 2,





**fig.**  
**4-PM2**







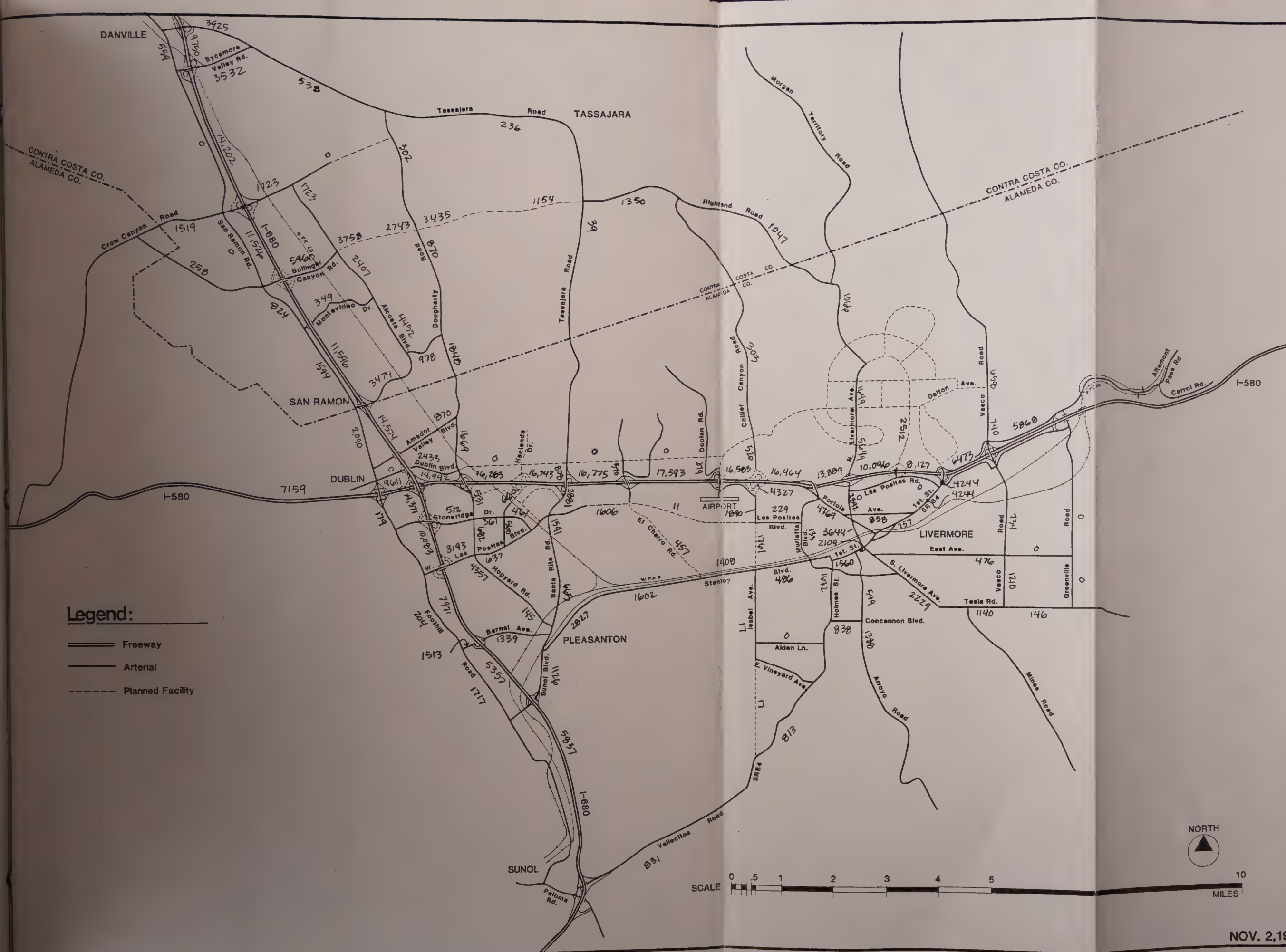
# Las Positas

## Transportation Analysis

2005 AM PEAK HOUR TRAFFIC VOLUMES  
WITH LAS POSITAS

fig. 4-AM3

NOV. 2, 1983





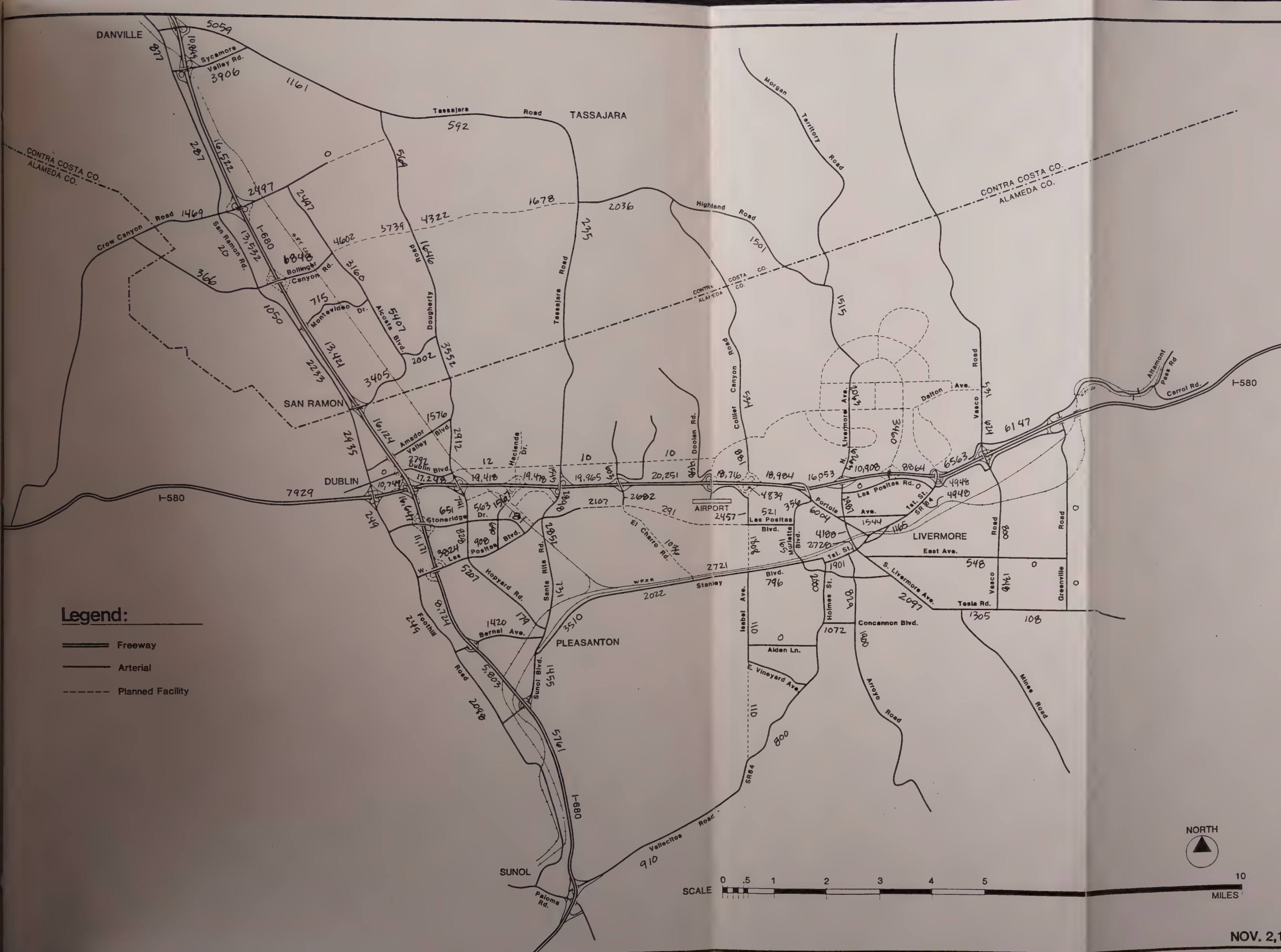


# Transportation Analysis

**WITH LAS POSITAS**

fig.

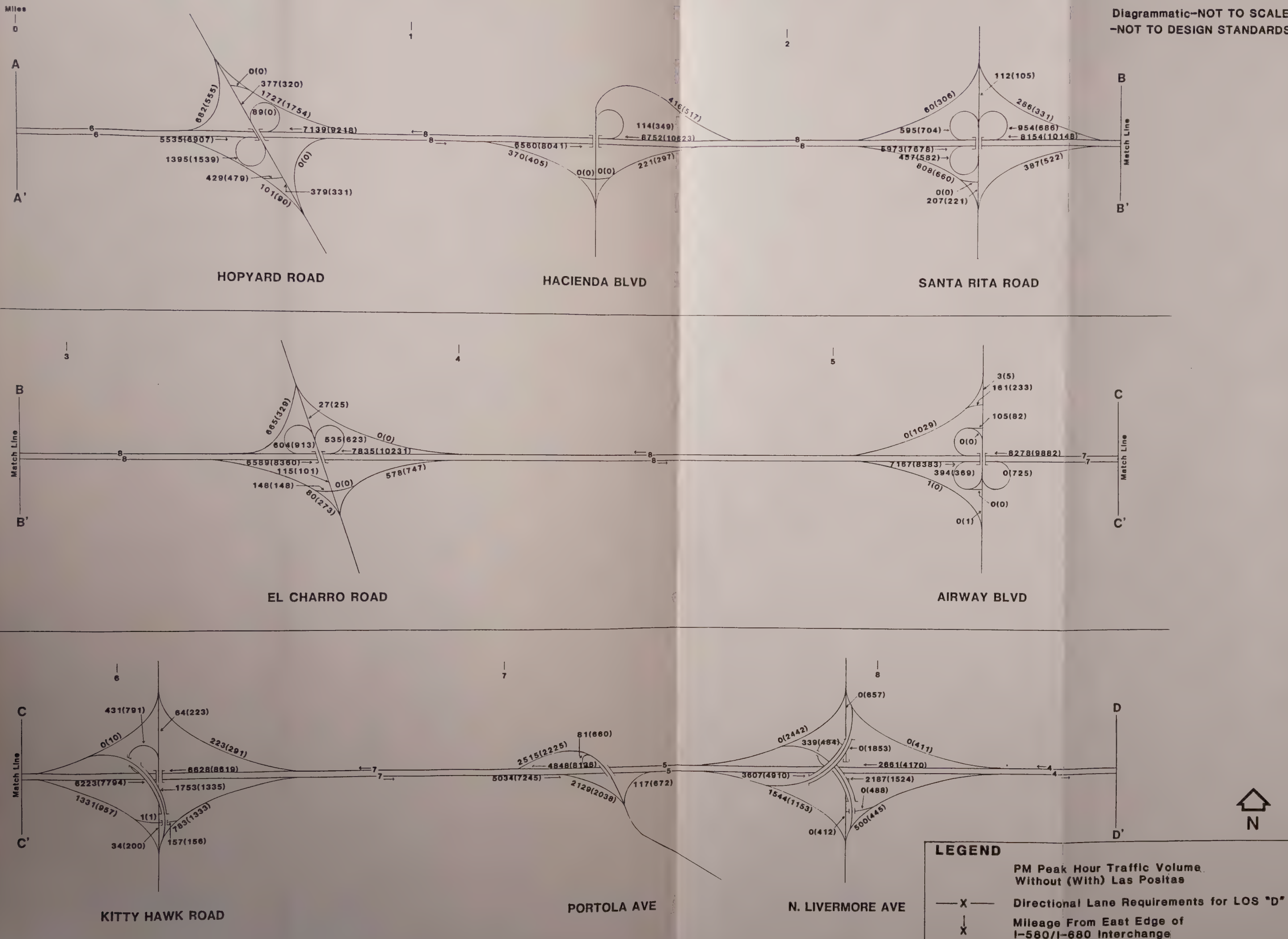
NOV. 2, 1983







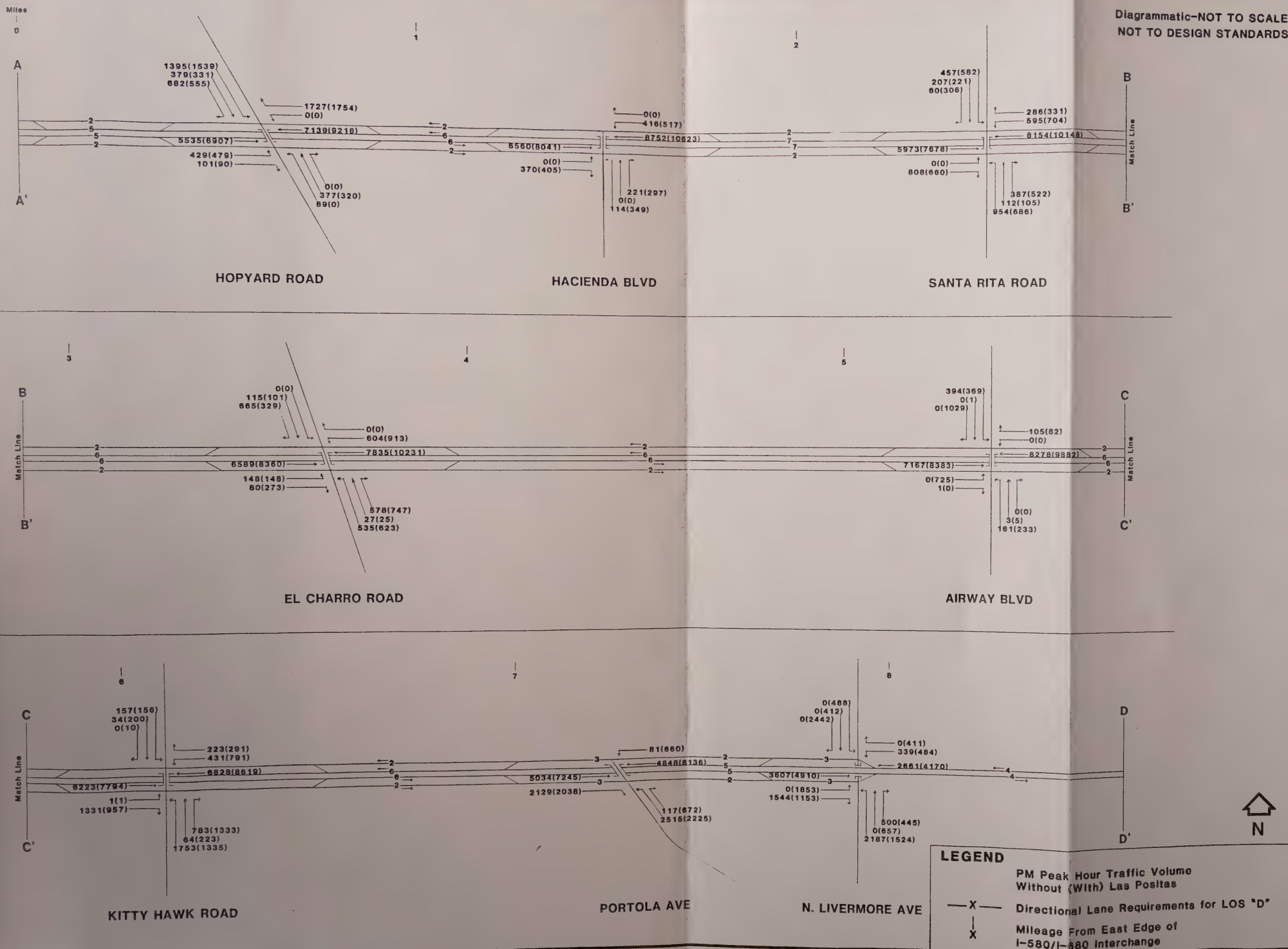
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**I-580 DESIGN CONCEPT TWO  
FOR 2005  
SIGNALIZED COLLECTOR-DISTRIBUTOR ROADS**

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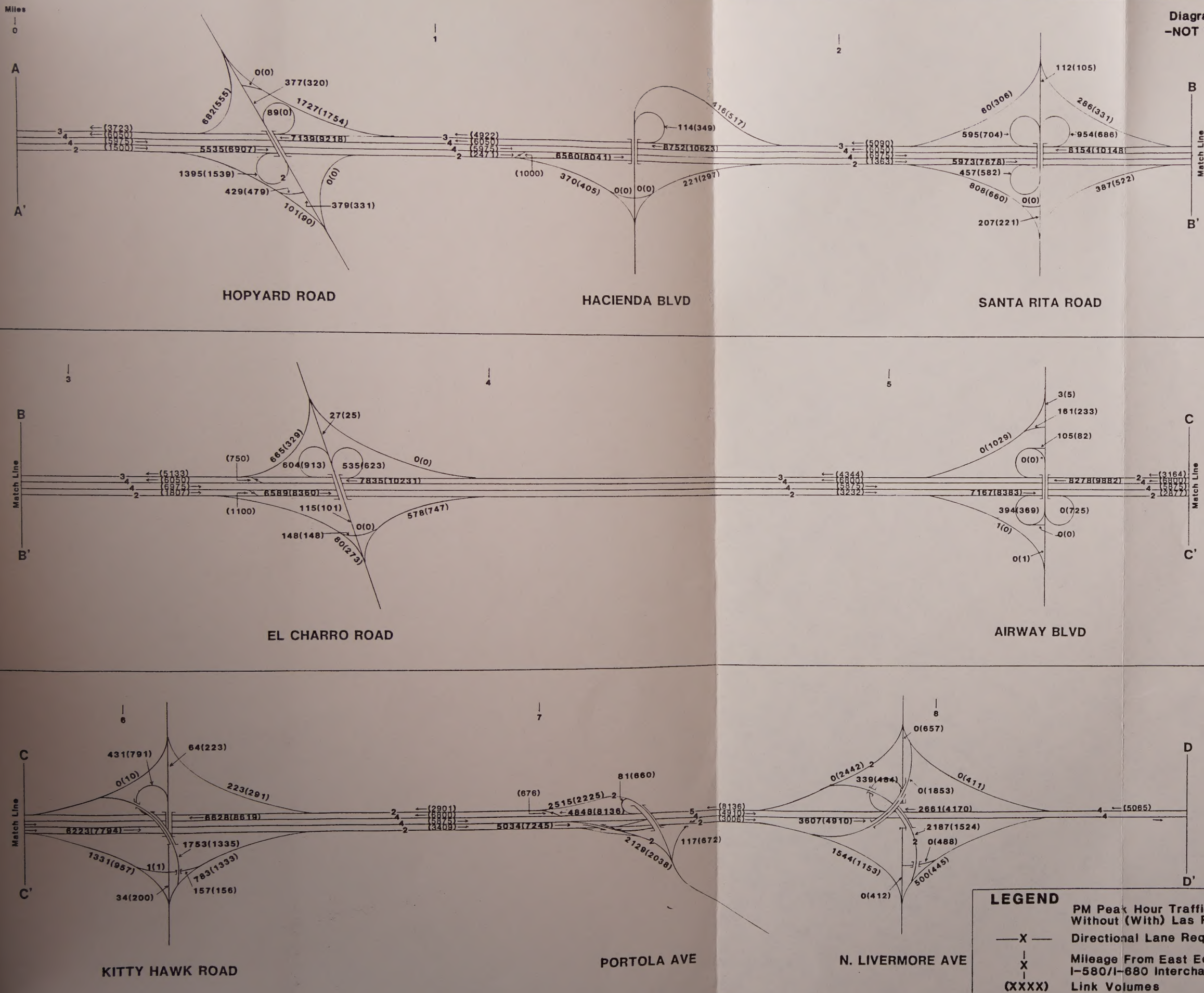
# Las Positas

## Transportation Analysis

### I-580 DESIGN CONCEPT THREE FOR 2005 PARALLEL FREEWAY LANES

fig. 50

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